

1 DAVID CHIU, State Bar #189542  
City Attorney  
2 JONATHAN C. ROLNICK, State Bar #151814  
Chief Labor Attorney  
3 LAUREN E. WOOD, State Bar #280096  
ADAM M. SHAPIRO, State Bar #267429  
4 Deputy City Attorneys  
Fox Plaza, 1390 Market Street, 7th Floor  
5 San Francisco, California 94102-5408  
Telephone: (415) 554-4261 (Wood)  
6 (415) 554-3830 (Shapiro)  
Facsimile: (415) 554-4699  
7 E-Mail: lauren.wood@sfcityatty.org  
adam.shapiro@sfcityatty.org  
8  
9 Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

10  
11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 SELINA KEENE, MELODY FOUNTILA,  
14 MARK MCCLURE,  
15 Plaintiffs,  
16 vs.  
17 CITY and COUNTY OF SAN FRANCISCO  
18 Defendant.

Case No. 22-cv-01587-JSW

**DECLARATION OF LAUREN E. WOOD IN  
SUPPORT OF DEFENDANT'S RESPONSE TO  
MOTION TO ENTER ORDER PURSUANT TO  
THE NINTH CIRCUIT'S MEMORANDUM**

Filed: March 14, 2022  
Trial Date: None set

1 I, Lauren E. Wood, hereby declare:

2 1. I am a member of the bar of the state of California and counsel of record for Defendant  
3 City and County of San Francisco in this action ("the City"). I submit this declaration to support the  
4 City's Response to Plaintiffs' Motion to Enter an Order Pursuant to the Ninth Circuit's Memorandum  
5 ("City's Response Brief").

6 2. Pursuant to the Court's July 6, 2023 Order allowing the City to take expedited  
7 discovery, Dkt. No. 85, I took the depositions of Plaintiffs Melody Fountila and Selina Keene on July  
8 21, 2023 and July 24, 2023, respectively. Attached hereto as **Exhibit 1** is a true and correct copy of  
9 excerpts from the transcript of Ms. Fountila's July 21 deposition. Attached hereto as **Exhibit 2** is a  
10 true and correct copy of excerpts from the transcript of Ms. Keene's July 24 deposition.

11 3. At Ms. Keene's deposition, I introduced her religious vaccine exemption request as  
12 Exhibit 3. That exhibit is the same document authenticated by and attached to the Declaration of  
13 Brendan Lim as Exhibit 1. Likewise, I introduced the followed-up questions posed by Human  
14 Resources personnel and Ms. Keene's responses as Exhibit 4 during her deposition. That exhibit is the  
15 same document authenticated by and attached to the Declaration of Brendan Lim as Exhibit 2.

16 4. At Ms. Fountila's deposition, I introduced her religious vaccine exemption request as  
17 Exhibit 3. That exhibit is the same document authenticated by and attached to the Declaration of  
18 Brendan Lim as Exhibit 4. Likewise, I introduced the followed-up questions posed by Human  
19 Resources personnel and Ms. Fountila's responses as Exhibit 4 during her deposition. That exhibit is  
20 the same document authenticated by and attached to the Declaration of Brendan Lim as Exhibit 5.

21 5. It is the City practice to maintain the confidentiality of City employees' personnel  
22 records, including vaccine exemption requests. Prior to filing the City's Response Brief, I contacted  
23 Plaintiffs' counsel of record, Russell Davis, and advised him that the City intended to file Plaintiffs'  
24 vaccine exemption records in support of the City's Response Brief. I expressly identified the four  
25 deposition exhibits identified in Paragraphs 3 and 4, above, and also attached Exhibits 3 and 6 to  
26 Brendan Lim's Declaration, which are the City's denials of Plaintiffs' exemption requests and asked  
27 Mr. Davis to confirm that the City could publicly file such documents. At Plaintiffs' depositions, Mr.  
28 Davis did not designate any portions of the depositions confidential. Nevertheless, I also asked him to

1 confirm that the City could publicly file excerpts of Plaintiffs' deposition transcripts and to  
2 affirmatively identify any testimony he considered confidential. Mr. Davis responded that the only  
3 plaintiff information he considered confidential was their Social Security Numbers and "medical  
4 records."

5 6. The City's COVID-19 Vaccination Policy ended effective August 23, 2023.  
6 Information regarding the end of the City's policy is publicly available at <https://sfdhr.org/covid-19>.

7 I declare under penalty of perjury under the laws of the State of California and the United  
8 States that the foregoing is true and correct. Executed August 25, 2023 in San Francisco, California.

9  
10 /s/ *Lauren E. Wood*  
11 LAUREN E. WOOD  
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# EXHIBIT 1

MELODY FOUNTILA - July 21, 2023

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

--oOo--

SELINA KEENE, MELODY FOUNTILA, MARK McCLURE,	) Case No.
	) 4:22-cv-01587-JSW
	) Related Case Nos.:
Plaintiffs,	) 4:22-cv-03975-JSW
	) 4:22-cv-04319-JSW
vs.	) 4:22-cv-04633-JSW
	) 4:22-cv-06013-JSW
	) 4:22-cv-07455-JSW
	) 4:22-cv-07645-JSW
CITY AND COUNTY OF SAN FRANCISCO;	) 4:23-cv-00211-JSW
LONDON BREED, MAYOR OF	)
SAN FRANCISCO IN HER OFFICIAL	)
CAPACITY; CAROL ISEN, HUMAN	) Volume I
RESOURCES DIRECTOR, CITY AND	)
COUNTY OF SAN FRANCISCO, IN HER	)
OFFICIAL CAPACITY; DOES 1-100,	)
	)
Defendants.	)
	) Pages 1 - 118

DEPOSITION BY ZOOM OF  
MELODY FOUNTILA  
JULY 21, 2023

REPORTED BY:

ANGIE M. MATERAZZI, CSR 13116

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JAN BROWN & ASSOCIATES  
WORLDWIDE DEPOSITION & VIDEOGRAPHY SERVICES  
701 Battery St., 3rd Floor, San Francisco, CA 94111  
(415) 981-3498 or (800) 522-7096

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**A P P E A R A N C E S**

**(ALL PARTIES APPEARING VIA VIDEOCONFERENCE)  
FOR PLAINTIFFS SELINA KEENE, MELODY FOUNTILA,  
MARK McCLURE:**

**BY: RUSSELL DAVIS, ESQ.  
PACIFIC JUSTICE INSTITUTE  
29 LAKEWOOD AVENUE  
SAN FRANCISCO, CALIFORNIA 94127  
Tel: 415.310.6575  
Email: RDAVIS@PJI.ORG**

**FOR DEFENDANT CITY AND COUNTY OF SAN FRANCISCO:**

**BY: LAUREN WOOD, ESQ.  
ADAM SHAPIRO, ESQ.  
OFFICE OF THE CITY ATTORNEY  
1390 MARKET STREET, 5TH FLOOR  
SAN FRANCISCO, CALIFORNIA 94102  
Tel: 415.554.4261  
Email: lauren.wood@sfcityatty.org  
Email: adam.shapiro@sfcityatty.org**

**FOR PLAINTIFF CHARLOTTE RAE SANDERS:**

**BY: BEN NORTH, ESQ.  
BINNALL LAW GROUP  
717 KING STREET, SUITE 200  
ALEXANDRIA, VIRGINIA 22314  
Tel: 703.888.1943  
Email: ben@binnall.com**

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**A P P E A R A N C E S**

**FOR PLAINTIFF DAVID GOZUM:**

**BY: ARKADY ITKIN, ESQ.**

**LAW OFFICE OF ARKADY ITKIN**

**57 POST STREET, SUITE 812**

**SAN FRANCISCO, CALIFORNIA 94104**

**Tel: 415.640.6765**

**Email: arkady@arkadylaw.com**

**FOR PLAINTIFF DENISE DEBRUNNER:**

**BY: ROBERT WEISENBURGER, ESQ.**

**LiMANDRI & JONNA**

**P.O. BOX 9120**

**RANCHO SANTE FE, CALIFORNIA 92067**

**Tel: 858.759.9930**

**Email: rweisenburger@limandri.com**

**FOR PLAINTIFF DENISE DEBRUNNER:**

**BY: JOHN C. SULLIVAN, ESQ.**

**SL LAW, PLLC**

**610 UPTOWN BOULEVARD, SUITE 2000**

**CEDAR HILL, TEXAS 75104**

**Tel: 469.523.1351**

**Email: john.sullivan@the-sl-lawfirm.com**

**ALSO PRESENT:**

**DAVID GOZUM, PLAINTIFF**

**O'BRYANT MURALLES, DEPO TECHNICIAN**

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1 BE IT REMEMBERED that, pursuant to Notice of  
2 Taking Deposition, and on Friday, July 21, 2023,  
3 commencing at 10:06 a.m. thereof, before me, ANGIE M.  
4 MATERAZZI, a Certified Shorthand Reporter, personally  
5 appeared remotely

6 MELODY FOUNTILA

7  
8 called as a witness by the Defendants, who, having been  
9 first duly sworn, was examined and testified as follows:

10 --oOo--

11 EXAMINATION BY MS. WOOD

12 Q. Good morning, Ms. Fountila. Am I pronouncing  
13 your name correctly?

14 A. **You are.**

15 Q. I'm Lauren Wood. I'm a deputy city attorney  
16 with the San Francisco City Attorney's Office and I'm  
17 representing the City and County of San Francisco in  
18 this matter.

19 Have you been deposed before?

20 A. **Yes.**

21 Q. How many times?

22 A. **Once.**

23 Q. When was that, approximately?

24 A. **Approximately -- maybe five or six years ago.**

25 Q. Do you recall what type of matter your



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1 MR. DAVIS: Lauren -- Lauren, one question. I  
2 don't recall 9704 being in her declaration.

3 MS. WOOD: Let's bring up the declaration,  
4 then.

5 MR. DAVIS: That's kind of a technical thing,  
6 but...

7 MS. WOOD: Can we go to the first page -- the  
8 second page. Sorry. I believe it is in Paragraph 4.

9 (Complied.)

10 MR. DAVIS: It is there. I'm sorry.

11 MS. WOOD: Okay. Could we -- let's take that  
12 back down.

13 (Complied.)

14 BY MS. WOOD:

15 Q. All right. Ms. Fountila, my question was: Is  
16 the 9704 Employment & Training Specialist position the  
17 only position you held during your time at the City?

18 **A. That was the position that I was in. However,**  
19 **you changed -- within that same position, you changed**  
20 **job -- you changed doing particular types of work.**

21 Q. Okay. So the classification stayed the same,  
22 but if I'm understanding, your job changed?

23 **A. Yes. Yes.**

24 Q. Well, maybe let's do it this way and start  
25 with when you -- let's focus on what your job duties

MELODY FOUNTILA - July 21, 2023

1 were when you first started at the City.

2 Could you just explain briefly what those  
3 were?

4 A. I started with -- taking a training with  
5 Curtis & Associates, which is a training similar to a  
6 path which is helping families that are on welfare  
7 transition to employment and for training.

8 Q. Okay. How long did you have this role of  
9 working with families who were on welfare?

10 A. I've been doing this for over -- I want to say  
11 30 years.

12 Q. Okay.

13 A. Before I started with the City and County.

14 Q. So this aspect of working with families on  
15 welfare, that was something that stayed constant through  
16 your whole employment?

17 A. My prior -- I worked with ex-offenders --  
18 well, no. I don't want to refer to them as  
19 ex-offenders. I would prefer to -- formerly  
20 incarcerated. I think that's the proper name.

21 Q. So right now I want to focus on your  
22 employment at the City, like the job --

23 A. Okay.

24 Q. -- you had at the City.

25 So in your role -- and maybe since you did

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1 but the type of the person that I am, I tried to assist  
2 them in any information that they needed.

3 Q. Thank you for that. So I understand what you  
4 were describing was sort of after the pandemic hit  
5 working from home.

6 Can we focus on before the pandemic when you  
7 were in the office.

8 Do you have an estimate for how many -- how  
9 large your caseload was, generally?

10 A. Yeah. So anywhere from 15 to 25. Sometimes  
11 it could be 30.

12 Q. Okay. And then prior to the pandemic, were  
13 you meeting with clients in person?

14 A. Yes.

15 Q. How often were you meeting in person --

16 A. Daily.

17 Q. And approximately how many meetings were you  
18 having per day?

19 A. Well, because of how the setup is, it's -- we  
20 meet in the morning. It could be anywhere between six  
21 to -- depending on how many people came to the workshop,  
22 right? So we meet in the morning, we go through  
23 exercises, and we have discussions. I do one-on-ones.  
24 Give instructions on how to interview in employment. I  
25 sit down and evaluate a person on where they're at. I

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1 then dispense that information to my cohorts. I can  
2 request for a person to go to training or I can start  
3 setting them up with getting their resume together.  
4 Their interviewing workshop. It's a variety of things  
5 that happen all at the same time, at different times,  
6 just depending on the flow of the day.

7 Q. Thank you for that.

8 MS. WOOD: I would like to bring your  
9 declaration back up. If we can see Exhibit 2 at  
10 Paragraph 3, please.

11 (Whereupon Exhibit 2 was placed on the  
12 screen.)

13 BY MS. WOOD:

14 Q. So I want to bring your attention to  
15 Paragraph 3, the first line.

16 And it says here, "It was always my desire to  
17 help people in need and to feel useful."

18 Do you see that?

19 A. Uh-huh.

20 Q. And so did working for the City Human Services  
21 Agency fulfill that desire that you had?

22 A. Yes.

23 Q. In what way?

24 A. Because I love helping people. I love seeing  
25 people transition. I love them understanding how

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1 important their lives are and how they have a purpose, a  
2 designed purpose, and that they brought their children  
3 into this world and that -- now you have to lead the way  
4 for them.

5 And I just -- I couldn't ask for a better  
6 career to be in. I couldn't ask for a better  
7 opportunity to do the type of work that I do. I love my  
8 job. I absolutely love my job. It's -- I didn't -- it  
9 wasn't a job to me because, you know, I just -- this is  
10 where I thrived at, you know. And I was able to give  
11 that to the clients that I served and...

12 Q. Thank you for that. We had touched on this a  
13 little bit before.

14 But prior to -- when you came to the City --  
15 and it says in your declaration here, From 1992 to 1999,  
16 you worked with the Northern California Service League;  
17 is that correct?

18 A. Yes.

19 Q. And according to your declaration, you  
20 supervised pre-release programs for incarcerated  
21 individuals to provide the necessary training, such as  
22 resume writing, interview skills to help these  
23 individuals obtain employment upon release.

24 Is that an accurate summary of what you did?

25 A. Yeah. I was the administrator, but I also

25

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1 conducted the life-skills workshops as well and I  
2 supervised and I went out to four institutions,  
3 San Quentin, the two Solano institutions and Pelican Bay  
4 State Prison, where I did a pre-release workshop with  
5 men in that position; and that was done quarterly.

6 But then when they came into our services or  
7 they came from across the street, because our --  
8 that is -- where we were located was right across the  
9 street from the hall of justice.

10 Q. Okay. Now, it says on the last sentence of  
11 your declaration here, at Line 13, "The goal of the  
12 programs was to reduce recidivism and it was very  
13 successful."

14 Do you see that?

15 A. Yes.

16 Q. So that must have been very rewarding work  
17 that you were doing at that time?

18 A. Absolutely.

19 Q. Did this fulfill your desire that you had to  
20 help people and feel useful?

21 A. Yes.

22 Q. Were you able to make the kinds of the  
23 connections with clients that you had at the City with  
24 these individuals who were going to be released and  
25 starting fresh?

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1           **A.     Yes.**

2           Q.     So would it be fair to say that although the  
3           population that you were working with was slightly  
4           different, because these were incarcerated individuals,  
5           pre-release --

6           **A.     The population wasn't different, pretty**  
7           **similar. Incarcerated individuals have families and**  
8           **so -- yeah.**

9           Q.     Okay. I just want to -- I think we spoke over  
10          each other a little bit, so I just want to --

11          **A.     Forgive me.**

12          Q.     That's okay. It's my fault, too. And so  
13          we'll -- we'll both, you know, try to do better.

14          I just want to make sure I'm understanding.

15          So do I have it right that, in your view, the  
16          populations you were working with, when you were working  
17          with incarcerated individuals, it was very similar to  
18          the people that you were serving when you were working  
19          for the City; is that correct?

20          **A.     Okay. Yes.**

21          Q.     That's correct?

22          Okay. And you were mentioning their families.

23          Did you help support the families of these  
24          individuals, also, in your role at the Northern  
25          California Service League?

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1           **A.    Yeah.    If it came up, definitely, yes.**

2           MS. WOOD: We can take that down.

3           (Complied.)

4           BY MS. WOOD:

5           Q.    And now -- the only other job, other than the  
6           City that's mentioned in your declaration, is the one we  
7           just talked about that you started in 1992.

8                   Did you have any other positions, any other  
9           professional work that you did prior to joining the  
10          Northern California Service League?

11                  MR. DAVIS: I think, Lauren, that's confusing.  
12                  Are you asking her before she worked for the  
13          City?

14                  MS. WOOD: No.

15          BY MS. WOOD:

16                  Q.    So before you worked -- prior to 1992, did you  
17                  have any other jobs before you joined the Northern  
18                  California Service League?

19                  **A.    Yes.**

20                  Q.    Could you -- let's maybe quickly go through  
21                  those chronologically.

22                          Could you tell me the first job that you had?  
23           And I'm interested in work sort of after -- you know,  
24           post high school, not after-school jobs or anything like  
25           that. Something you would deem as more of a real job, I

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1 Go ahead and answer.

2 THE WITNESS: I went to a training. I went to  
3 a training. I -- I -- I came home. Okay. So I came  
4 home that -- in my fourth year, I came home, but I went  
5 to college, because I had two classes that I needed to  
6 take to graduate, and I went to San Francisco State  
7 University. But at the same time, I ended up getting  
8 married. And then I took those classes, but I didn't  
9 finish getting my transcripts sent to -- you know, to be  
10 able to finish getting my degree from Clark. And I went  
11 to another training for being a cash -- working for  
12 Safeway.

13 BY MS. WOOD:

14 Q. Okay.

15 A. And that was in Oakland, I think.

16 Q. So maybe let's go about this a different way.

17 So looking at sort of the jobs where you were  
18 serving vulnerable populations, have you had any other  
19 positions, prior to your work at the City, in which you  
20 were doing similar work, serving vulnerable or at-need  
21 communities?

22 A. Well, I -- so while I was at -- it's a little  
23 strange, because it's the same employer, right? So I  
24 worked in a children's waiting room, where people who  
25 had business to conduct before the judge would bring

30

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1 their children, and I would find resources for the  
2 families when they brought the children in and  
3 provide -- so that they wouldn't have to be in the  
4 courtroom -- a place to be that was safe and fun and --  
5 yeah.

6 Q. Okay. For how many years, approximately, did  
7 you hold that position?

8 A. I did that for a year. And then I trained my  
9 successor and I became an employment specialist with the  
10 same company.

11 Q. Okay. So that was also Northern California  
12 Service League?

13 A. Yes, ma'am.

14 Q. Okay. And then we touched on your education.  
15 Did you ever have an opportunity to complete  
16 your degree?

17 A. I did.

18 Q. When was that?

19 A. That was in 2011. I went to Phoenix  
20 University -- University of Phoenix and I obtained a  
21 bachelor's of science in management to further my career  
22 with the City and County of San Francisco.

23 Q. Wonderful. Have you done any other college  
24 courses after receiving your degree in 2011?

25 A. So before 2011, I did a training about drugs

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1 entire time that you've been no longer working with the  
2 City, that you would have to repay your pension benefits  
3 that you received from SFERS?

4 **A. No. I'm not aware of that.**

5 MR. DAVIS: Same objection. Might call for a  
6 legal conclusion.

7 BY MS. WOOD:

8 **Q. Are you currently employed anywhere?**

9 **A. I did work temporarily for a nonprofit,**  
10 **Aspire, working with an after-school youth program.**

11 **Q. I think when you first logged in to the Zoom,**  
12 **I saw that it said Aspire Youth Engagement Programs**  
13 **Trainer next to your name.**

14 **A. Yeah.**

15 **Q. Is that -- are you -- you said you temporarily**  
16 **worked there.**

17 **Do you still work there?**

18 **A. Not now, no.**

19 **Q. Will you begin working there again when the**  
20 **school year starts up?**

21 **A. I don't know. It's left up to the executive**  
22 **director.**

23 **Q. When did you start working for Aspire?**

24 **A. I don't know. I want to say the beginning**  
25 **of -- no. Maybe February or -- or March of this year.**

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1 Q. And when did you stop working for Aspire?

2 A. Just since the June -- end the May, end of  
3 June.

4 Q. So when the school year ended?

5 A. Yes.

6 Q. Could you describe to me briefly what it was  
7 that you did as a youth engagement programs trainer at  
8 Aspire?

9 A. Well, I facilitated -- the opportunities I did  
10 have, one, is I facilitated a workshop for the -- oh, my  
11 brain. For the -- I forget what they're called now.

12 So you have people that are placed in the  
13 schools that run the after-school program, right? And  
14 they're, like, mentors, right? But that's not the name  
15 for them. I'm sorry. My brain is not allowing me to  
16 recall that.

17 So I did a training for them around customer  
18 service, engagement, how to be -- what not to do, those  
19 types of things like that, right? And then I did that  
20 one workshop for about -- I want to say about 30  
21 participants. I'm really trying to remember this name  
22 of the -- what they're called, but I won't let that  
23 deter me.

24 So then my job was to monitor -- go out to  
25 different schools to see if they were doing what they

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1 had been trained to do and making sure -- and then I  
2 attended meetings that the executive director would  
3 give, just so that I could make sure I translated that  
4 same information to the mentors that were over the  
5 students at the different schools. I was probably --  
6 probably eight schools that I might have to travel to.

7 Q. Okay. Did you find this type of work to be  
8 rewarding?

9 A. It's always rewarding when I can help  
10 individuals transform. Most of these individuals were  
11 young, some of them just starting college. I have  
12 wisdom that I can dispense. And any time I can bring a  
13 person to a different level in their lives, with the  
14 help of the Lord, then that gives me great joy. I think  
15 it's needed to guide young individuals in this life that  
16 we're now in, which is -- can be very crazy and I think  
17 my role was important.

18 Q. Are you hoping that you will be able to go  
19 back this school year?

20 A. I don't know. See, I'm trying to answer that  
21 question myself. I have a lot of things going on in my  
22 life. I'm trying to ascertain if I really want to work  
23 or do I just want to try and build something of my own  
24 or -- so I'm not sure. So I'm asking the Lord to direct  
25 me on what purpose He has for my life.

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1 Q. Okay. So other than Aspire Youth Engagement,  
2 have you held any other jobs or position since you left  
3 the City?

4 A. I did. My daughter was getting into the  
5 insurance business. And so in order to help her, I  
6 crunched my brain and I actually got a license for  
7 insurance, but I've not sold any insurance yet.

8 Q. Okay.

9 A. But I tried to help her.

10 Q. All right. Have you applied for any other  
11 jobs, apart from Aspire, since you left the City in  
12 April of 2022?

13 A. No.

14 Q. Did you ever consider reaching out to your  
15 former employer, Northern California Service League, to  
16 see if they had any openings that would be suited to  
17 your skills?

18 A. Well, the thing is this: I'm on the board of  
19 the Northern California Service League, so I couldn't be  
20 on the board and work for them.

21 Q. Okay. That makes sense. So how long have you  
22 been on the board?

23 A. For a long time. I think -- whatever amount  
24 of time -- once I left the agency, which was maybe two  
25 or three years later, the executive director, at that

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1 time, stated she wanted me to be on board, so I obliged  
2 her, which was -- it was my pleasure, because that type  
3 of -- that -- that -- that is my line of work. I  
4 believe -- yeah.

5 I believe in what they did. I believe in what  
6 I used to do, and I think it was definitely something  
7 that needed to continue, yes.

8 Q. Okay. So by serving on the board, would it be  
9 fair to say that that enabled you to further the mission  
10 of the type of work you were doing, but in a different  
11 role?

12 A. I could -- I think you could say that.

13 Q. Okay. After you left the City, did you look  
14 to see if any other Bay Area cities or counties have  
15 human services agencies that offer similar programs to  
16 what the City of San Francisco was offering?

17 A. I looked. I think I looked -- I had so much  
18 going on at the time. I think I looked, but I didn't  
19 apply for anything. I was pretty distraught. I even  
20 believe I was depressed. It's just -- it was just --  
21 it's been difficult, you know. I -- yeah. It's been  
22 difficult.

23 Q. But other counties do have similar  
24 positions --

25 A. Yes, they do.

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1 Q. Are you aware of any, like, nonprofits in the  
2 Bay Area that provide similar types of services that the  
3 City of San Francisco was, you know, offering through  
4 the Human Services Agency?

5 A. You said nonprofits?

6 Q. Yes. Sort of doing employment training or  
7 at-risk --

8 A. Not -- not that I can think of, off the top of  
9 my head.

10 MR. DAVIS: Objection. Calls for speculation.  
11 BY MS. WOOD:

12 Q. After you left the City's employment, at any  
13 time, did you do any research to see if there were any  
14 nonprofits in the Bay Area that were doing sort of  
15 employment-related assistance and counseling services,  
16 similar to the work you had been doing at the City?

17 A. I wouldn't call it research. I was trying to  
18 figure out what I was going to do with my life after my  
19 career kind of got pulled out from underneath me, and  
20 trying to manage my life, because -- yeah, they were --  
21 there were other things going on.

22 Q. Okay. I just want to make sure I understand.  
23 So you said you wouldn't call it research, but  
24 did you do anything like Internet searches or --

25 A. I think -- I want to say -- I think I looked

40



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1 into the human services out here in Pittsburgh, but I  
2 didn't apply for any positions or anything like that.  
3 Not that I can remember, yeah.

4 Q. Have you ever heard of a nonprofit called  
5 Opportunity Junction that's in Antioch?

6 A. No.

7 Q. Okay. I think we've been going about an hour.  
8 Would you like to have a short -- would a  
9 short break be okay?

10 A. Sure. I would love that, so I can go to the  
11 bathroom.

12 MS. WOOD: We can go off the record.

13 (Off the record at 10:57 a.m. and back  
14 on the record at 11:07 a.m.)

15 MS. WOOD: Are we back on the record?

16 MR. DAVIS: Yes.

17 MS. WOOD: Are you ready to go, Angie?

18 THE REPORTER: Yes.

19 BY MS. WOOD:

20 Q. So, Ms. Fountila, I want to switch gears a  
21 little bit and talk about the COVID-19 vaccines that  
22 were available in 2021 and 2022. And I just want to  
23 sort of make sure we have the same basic understanding,  
24 in terms of -- you know, when we're using terminology.

25 Do you understand that there were three

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1 vaccines available in the U.S.?

2 **A. I believe -- yes.**

3 Q. Okay. Do you know what those different  
4 vaccines are called?

5 **A. I think one was Moderna, Pfizer,**  
6 **Johnson & Johnson.**

7 **Q. Okay. So when I'm asking these next set of**  
8 **questions, if I use the term "COVID-19 vaccine," that**  
9 **more general term, I want you to understand that I'm**  
10 **referring to all three of the vaccines that were**  
11 **available in the U.S. in 2021 and 2022, which would be**  
12 **the Pfizer, the Moderna and Johnson & Johnson.**

13 **Does that make sense?**

14 **A. It makes sense if they were vaccines that were**  
15 **legitimate.**

16 Q. And now if I ask -- if I want to ask a  
17 question about a particular vaccine, then I'm going to  
18 use the name, like Pfizer, Moderna or Johnson & Johnson,  
19 so that you can understand my question is specific to  
20 that vaccine.

21 Does that make sense?

22 **A. Okay.**

23 Q. And then I would ask for clarity in your  
24 responses, if you could do the same. If you're talking  
25 about all three, generally, you could use the general

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1 term vaccines, but if you're talking about one specific  
2 one, it would be really helpful if you could identify it  
3 by name.

4 A. Yes.

5 Q. Thank you for that. Do you have any concerns  
6 about the safety of the Pfizer vaccine?

7 A. Yes.

8 Q. What are those concerns?

9 A. They're unsafe and ineffective and what they  
10 did to arrive at where they're at. Because I don't  
11 consider them vaccines.

12 Q. Okay. You don't consider Pfizer to be a  
13 vaccine.

14 A. No.

15 Q. What do you consider it to be?

16 A. I don't know what it is. It's not -- it was  
17 never -- they were never proven to be legitimate  
18 vaccines that take 10 to 20 years to develop.

19 Q. So is the fact that the development, as you  
20 understand it, that the Pfizer vaccine was in a shorter  
21 time frame, is that a source of your concern about  
22 taking that vaccine?

23 A. It's a concern, but it didn't matter. My  
24 concerns have completely different reasons for me not  
25 taking any vaccine.

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1 Q. Okay. So you said that you have concerns that  
2 the Pfizer vaccine is unsafe.

3 In what ways do you believe it's unsafe?

4 A. I've --

5 MR. DAVIS: I'm going to object to the extent  
6 that it calls for expert testimony -- expert scientific  
7 testimony.

8 But go ahead and answer.

9 BY MS. WOOD:

10 Q. And I'm just asking for what you believe. Why  
11 do you believe it's unsafe, you personally?

12 A. They weren't proven to be legitimate vaccines.

13 Q. When did you first start to feel those  
14 concerns that the Pfizer vaccine was not a legitimate  
15 vaccine?

16 A. My main concern was how they derived the  
17 vaccine and that was through aborted fetal tissues.  
18 That's my concern. And then there was 293 times they  
19 tried to -- so that they could get a viable kidney in  
20 order to use -- to do what they needed to do. The child  
21 was alive. They did not want to use anesthesia because  
22 it would mess up the kidney. And that is what disturbed  
23 me, because that is murder and that is against what I  
24 believe in.

25 Q. So that -- the description you just gave,

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1 where did you get that information from?

2 A. One is the National Geographic. I got it from  
3 several different reliable sources that I can't think of  
4 right now, but that's the main thing.

5 Q. And when did you first read that National  
6 Geographic article?

7 A. The National Geographic was recent.

8 Q. So had you read the National Geographic  
9 article before or at the time that you submitted your  
10 vaccine exemption request?

11 A. No. I read things from -- online -- I'm  
12 sorry. Say that again.

13 Q. No. Go ahead. You said you read things  
14 online.

15 What websites were you reading?

16 A. I can't recall a lot of this -- these things  
17 that you're asking, but just know that that's my --  
18 that's how I feel about this. And then I'm just --  
19 I'm -- okay.

20 Q. So I had asked -- in my question I started  
21 talking about Pfizer, but -- we'll talk about all the  
22 vaccines.

23 So do you feel that all three vaccines,  
24 Pfizer, Moderna and Johnson & Johnson, are unsafe?

25 A. Yes.

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1 Q. Do you have any specific safety concerns about  
2 them, and I'm not talking about the way they're  
3 produced, but just in terms of safety concerns about the  
4 vaccines themselves?

5 A. Yes.

6 Q. What are those safety concerns?

7 MR. DAVIS: Objection. Lauren, can you expand  
8 on what you mean by "safety concerns."

9 MS. WOOD: That's not really an objection.

10 BY MS. WOOD:

11 Q. Ms. Fountila, do you understand the question  
12 that I have --

13 MS. WOOD: I'm asking her personally if she  
14 was concerned about the safety of those vaccines.

15 THE WITNESS: I'm concerned about the safety  
16 of the vaccine, because nothing was proven. I don't  
17 even know if they were -- did any testing that was  
18 relevant. It was put together really quickly, when most  
19 vaccines take 10, 15, 20 years. And I wasn't going to  
20 jump into something that I knew very little about.

21 BY MS. WOOD:

22 Q. Did you have any concerns that if you were  
23 vaccinated with one of the vaccines for COVID-19, that  
24 it could be harmful to your health?

25 A. Yeah.

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1 Q. Did you have any specific concerns about types  
2 of harm that you thought might --

3 A. Because -- I'm sorry.

4 Q. Sorry. I think we're talking over each other.  
5 Let me finish my question.

6 Did you have -- were there any specific health  
7 issues that you had in mind that you thought could  
8 befall you if you took those vaccines?

9 A. So -- yes. So there -- okay. So the --  
10 the -- the VAERS report, right, stated almost 500 and  
11 something deaths, and that I did see. For the  
12 different -- one of the -- one of the Pfizer reports,  
13 it's like 500 and something deaths. And that was back  
14 in 2020. And, like, almost 900 and something -- I don't  
15 remember off the top of my head, but injuries to people.  
16 That was on the VAERS data reporting system, adverse  
17 something, but it's V-A-E-R-S.

18 For another one of the vaccines, it was  
19 determined like another amount of deaths and another  
20 amount of injuries that was in the hundreds of  
21 thousands. So with just seeing that alone, I said, no,  
22 no.

23 Q. Would it be fair to say that you were  
24 concerned that if you took one of these vaccines --

25 A. I would not.

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1 correct?

2 **A. I think so.**

3 Q. Did you receive any treatments when you were  
4 in the hospital?

5 **A. I did.**

6 Q. Do you recall what those treatments were?

7 **A. No. I don't know.**

8 Q. Were you given any medications when you were  
9 at Kaiser being treated for COVID-19?

10 **A. I was.**

11 Q. Do you recall the names of any of those?

12 **A. I recall one, because later -- I wasn't aware**  
13 **that I was given this particular treatment, because I**  
14 **would have denied it, and it's remdesivir.**

15 **Q. Now, in Paragraph 7 of your declaration, you**  
16 **also say that you've been told by doctors that you now**  
17 **have natural immunity to COVID-19.**

18 **A. Not only have I been told, I have documents.**  
19 **Because I -- I have documented that I have natural**  
20 **immunity antibodies against that, and I -- yeah, so...**

21 **MS. WOOD: Okay. We can take down this**  
22 **exhibit.**

23 **(Complied.)**

24 **BY MS. WOOD:**

25 **Q. What is your understanding -- and I know**



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1 you're not a scientist. Just your own understanding of  
2 what it means to have natural immunity to COVID-19.

3 What does that mean to you?

4 A. That means once you receive a virus and get  
5 it, your body is made up and you receive natural  
6 antibodies against that virus that you received. Your  
7 body is uniquely and wonderfully made and it works for  
8 you.

9 Q. Do you believe that natural immunity is more  
10 effective than vaccination in preventing the  
11 transmission of COVID-19?

12 A. I do.

13 Q. When did you first come to believe that?

14 A. I don't remember when I first came to believe  
15 that, but I believe it.

16 Q. And you've held that belief for some time?

17 A. Yes.

18 Q. What is the basis for your belief that natural  
19 immunity is more effective than vaccination?

20 MR. DAVIS: Objection to the extent it calls  
21 for scientific or expert testimony.

22 BY MS. WOOD:

23 Q. I'm just asking as to what you believe -- why  
24 do you believe that natural immunity is more effective  
25 than vaccination?

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1           A.    I probably have, but I can't remember where  
2   from.

3           Q.    So you don't recall anything that you --  
4   specifically that you read?

5           A.    I can't remember at this time, no.

6           Q.    Have you had conversations with anyone about  
7   the relative effectiveness of natural immunity from  
8   prior COVID infection in comparison to the immunity  
9   received from vaccination? And I'll just make a caveat.  
10   Conversations with anyone other than your attorney.

11          A.    Can you repeat that, please?

12          Q.    I'm just wondering if you've had conversations  
13   with anyone about the effectiveness of natural immunity  
14   versus vaccination?

15          A.    I've spoke -- my -- my pastor distributed a  
16   lot of information to his parishioners. We had weekly  
17   meetings on Zoom, where he gave information about COVID,  
18   about a lot of different things, yeah.

19          Q.    What kind of information did he give you about  
20   COVID?

21          A.    I can't remember all of the information, but  
22   we had weekly meetings and we talked about -- he put on  
23   podcasts and information to provide us with informative  
24   information about COVID, about what was going on, about  
25   how our natural immunity was best. A lot of different

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1 information on a regular basis.

2 Q. And did you listen to all these podcasts that  
3 he was putting out?

4 A. I sure did.

5 Q. And was the information he was providing about  
6 COVID, you had mentioned natural immunity, was that  
7 scientific-type information?

8 A. Scientific-type information from scientists,  
9 doctors, legal counsel, the Senator Johnson from Texas,  
10 Dr. -- oh, boy, I can't think of his name right now,  
11 so...

12 Q. So would it be fair to say that your pastor --  
13 and this is Pastor Gistand -- was compiling information  
14 from a variety of sources, different scientists,  
15 legal -- you said, counselors or advisers, politicians,  
16 and sharing that information with his congregation?

17 A. Yes.

18 Q. Do you think it was unfair that the City was  
19 requiring you to get the COVID-19 vaccination when you  
20 had already been infected with COVID-19?

21 A. Yes.

22 Q. Why do you think that?

23 A. Because I had natural immunity --

24 Q. So you think --

25 A. -- that I had required -- I had asked for a

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1 **religious exemption.**

2 Q. Okay. But I'm not asking about the religious  
3 exemption right now. I was just asking about natural  
4 immunity.

5 So do you think that they should have exempted  
6 you from getting the vaccine because of your natural  
7 immunity?

8 **A. Certainly.**

9 MS. WOOD: Let's bring back up the  
10 declaration, which is Exhibit 2. And I want to go down  
11 to Paragraph 13, which --

12 (Whereupon Exhibit 2 was placed on the  
13 screen.)

14 MS. WOOD: There it is.

15 BY MS. WOOD:

16 Q. So I just want to draw your attention to the  
17 last line of Paragraph 13, where it says, "Given my  
18 natural immunity, there is no reason why I can't be  
19 allowed to work."

20 Do you see that?

21 **A. Yes.**

22 Q. What did you mean by that statement?

23 **A. What I just stated.**

24 Q. So you felt that your -- you didn't pose a  
25 risk to others, whether members of the public or

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1 coworkers, because you had COVID in the summer of 2021?

2 A. True.

3 Q. Okay.

4 A. Yes.

5 MS. WOOD: Okay. We can take that down.

6 (Complied.)

7 BY MS. WOOD:

8 Q. You identify as a Christian, correct?

9 A. I do.

10 Q. Do you -- strike that.

11 How long have you been a Christian?

12 A. I was raised in a Christian household.

13 However, I didn't have a personal relationship with God  
14 and -- but in 1990, something very significant came into  
15 my life and everything changed.

16 Q. Okay. So you would say since 1990 you've had,  
17 what you felt, was a personal relationship with God; is  
18 that correct?

19 A. Yes.

20 Q. Do you currently belong to a particular  
21 denomination of Christianity?

22 A. No.

23 Q. Are you member of a church?

24 A. Yes.

25 Q. Which church is that?

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1 if you were receiving a letter?

2 **A. No.**

3 **Q. So we already noted that you did sign this**  
4 **letter.**

5 **Did you read through the whole letter before**  
6 **you signed it?**

7 **A. I did.**

8 **Q. And did you feel that all the statements in**  
9 **the letter reflected your personal belief?**

10 **A. I did.**

11 MS. WOOD: Okay. I just want to take a  
12 look -- if we could go up to the first page of the  
13 letter, which is Page 4 of the document.

14 (Complied.)

15 BY MS. WOOD:

16 **Q. Do you see in the middle of the page, it says,**  
17 **"Therefore, in my sincerely held belief as a spiritual**  
18 **being with a Christian worldview, I cannot use any**  
19 **product that takes its origin in abortion."**

20 Do you see that?

21 **A. I do.**

22 **Q. And what does that phrase "takes its origin in**  
23 **abortion" mean to you?**

24 **A. The way that it was developed. It was**  
25 **developed through murdering a child in a woman's -- from**

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1 THE WITNESS: Okay. Thank you.

2 BY MS. WOOD:

3 Q. Do you feel that the responses you provided to  
4 the City in these e-mails were truthful and accurate?

5 A. Yes.

6 MS. WOOD: So let's go back up to Page 10. I  
7 want to pause at the first No. 1.

8 (Complied.)

9 BY MS. WOOD:

10 Q. So the first question here was, "Please  
11 identify the specific religious tenet that prohibits the  
12 COVID-19 vaccination."

13 Do you see that?

14 A. Yes.

15 Q. And you wrote in, "As stated in my exemption,  
16 my body is the temple of God. It is not to be subjected  
17 to coercive experiments with clear danger and harm  
18 already proven by the CDC/VAERS."

19 A. Yes.

20 Q. And so here in this form, you were identifying  
21 that the reason you cannot receive the vaccine is  
22 because of the clear danger and harm that the vaccine  
23 poses, correct?

24 A. Yes. And I also say that the body is the  
25 temple of the Holy Ghost, which is of God, and that

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1 **comes from the Bible.**

2 Q. Okay. Let's go down to No. 5. This question  
3 asks: "Do you regularly worship with others sharing  
4 your beliefs about the COVID-19 vaccine? If so, how  
5 often and where are services generally held?"

6 **A. I can't -- I can't state other people's**  
7 **thoughts or opinions, but I do worship with other**  
8 **believers on a regular basis.**

9 Q. Okay. And in response to this question, you  
10 wrote, "This line of questioning is also irrelevant to  
11 the matters at hand and appears to only serve some  
12 data-gathering agenda."

13 **A. Yes.**

14 Q. Why did you write that it was irrelevant?

15 **A. Because it is. How many times I go to church**  
16 **has nothing to do with you telling me -- it had nothing**  
17 **to do with the current situation at hand.**

18 Q. Why did you believe it had nothing to do with  
19 it?

20 **A. Because what does me going to church have to**  
21 **do with you forcing me to take a vaccine?**

22 Q. And then you said, "That it only -- "appears  
23 to only serve some data-gathering agenda."

24 Can you explain to me what you mean by --

25 **A. I think during that time there was some kind**

90



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1 combination with others.

2 MR. DAVIS: Objection. You misstated her  
3 response.

4 Go ahead. You can answer.

5 THE WITNESS: My mother gave me -- whichever  
6 those are. I haven't taken one in my adulthood that I  
7 knowingly remember taking.

8 BY MS. WOOD:

9 Q. Do you have children?

10 A. I do.

11 Q. You mentioned a daughter.

12 How many children do you have?

13 A. Three.

14 Q. And how old are they?

15 A. Thirty-eight, 35 and 30.

16 Q. Did you have your children vaccinated when  
17 they were children?

18 A. I believe so.

19 Q. Did you do any research before having them  
20 vaccinated to see whether or not those vaccines were in  
21 any way connected to, you know, aborted fetuses?

22 A. No. But I trusted my doctor and I went with  
23 her suggestion to give my child a vaccination, yes.

24 Q. Okay. Let's go to the next page, which is

25 Page 12. I'm going to look at Question No. 5, which

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1 says, "Many common medications were also developed using  
2 the same type of technology used in the development of  
3 the COVID-19 vaccine." And then it lists a long list of  
4 different medications.

5 Do you see that?

6 A. I do.

7 Q. Have you ever taken Tylenol before?

8 A. Yes.

9 Q. When's the last time you've taken Tylenol, do  
10 you recall?

11 A. Over -- it's been over five years, at least.  
12 That's the minimum. But I'm pretty sure it was longer  
13 than that.

14 Q. All right. What about Pepto Bismol? Have you  
15 taken that before?

16 A. I have.

17 Q. When was the last time you've taken that?

18 A. It's been a long time.

19 Q. Do you have an estimate?

20 A. Over five years.

21 Q. So over five years would be approximately in  
22 2018?

23 A. I think so.

24 Q. Okay. Let's -- so the rest of the question  
25 says, "Do your beliefs prohibit you from taking and will

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1 you abstain in the future from taking these and other  
2 similar medications? If not, what tenet or belief  
3 prohibits the use of the COVID-19 vaccine, but permits  
4 the use of these other medications?"

5 And then in your response here, you say, "Let  
6 me say, I've been making healthier choices for myself to  
7 better my health and longevity in life."

8 Can you explain to me what you mean -- what  
9 you meant by that statement? What kind of healthy  
10 choices have you been making?

11 A. I lost weight. I've come off of all  
12 medications that I was ever taking when I was pain. I  
13 don't believe that they are going to assist me. I only  
14 believe that they will break my body down, so I no  
15 longer take these things that jeopardize my health. I'm  
16 trying to get healthier. I want to be healthier. I've  
17 changed my diet. So I'm just trying to get my body in a  
18 better state and I've been doing that for quite some  
19 time.

20 Q. When, approximately, did you start making  
21 these new healthy lifestyle changes?

22 A. Probably over 10 years, maybe 15 years I've  
23 been trying to do things to better my health.

24 Q. Okay. So you mentioned you changed your diet?

25 A. Yes.

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1 Q. In what ways did you change your diet?

2 A. I stopped eating fast-foods. I started  
3 cooking from home. I started going to the gym.

4 Q. Okay. I think you had mentioned you stopped  
5 taking medication for pain.

6 Do you recall when you stopped taking  
7 medication?

8 A. I can't remember. I want to say it was  
9 somewhere in the mid-2000s. Early 2000, somewhere  
10 around in there.

11 Q. Are there specific medications that you chose  
12 to stop taking?

13 A. Yes. Norco.

14 Q. And that was a choice for your health?

15 A. That was a choice for my pain.

16 Q. I mean, to stop taking it?

17 A. Yes.

18 Q. Okay. And then as part of this change to  
19 making healthier choices, when you made this change,  
20 were you still taking over-the-counter-type medication,  
21 such as Tylenol, aspirin, Advil?

22 A. No.

23 Q. When did you stop taking those types of  
24 medications?

25 A. I can't really say. It's been a while, that I

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1 can remember. I'm trying to think. I did have hip  
2 surgery, so I think maybe then there might have been  
3 some type of medications that I took, and that was in  
4 2017.

5 Q. Okay. Since 2017, other than the time you  
6 were hospitalized with COVID, have you taken any other  
7 medication?

8 A. Not that I can remember, no.

9 Q. And is this choice to stop taking medication  
10 part of your overall shift that you had to focus on  
11 healthier choices and wellness?

12 A. Yes.

13 Q. I want to go back to your response.

14 After the sentence we just looked at, it says,  
15 "If what you're saying is true, then society, as a  
16 whole, should know this to make wiser choices."

17 Can you tell me what that sentence is in  
18 reference to?

19 A. I mean, if you want to prolong your life, you  
20 got to make better life choices, right? It's as plain  
21 and simple as that.

22 Q. Okay. And then in response to this question,  
23 you wrote, "The difference is that these products" --  
24 which I assume means the drugs listed in Question 5 --  
25 "are not being forced upon us at the threat of our

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1 Is that -- is that different to you?

2 **A. Could you repeat that question, please.**

3 **Q. So in terms of -- in terms of the medications**  
4 **you may have taken in the past, that was your choice**  
5 **whether or not to the take them, correct?**

6 **A. Correct.**

7 **Q. And do you feel that with the vaccine mandate**  
8 **with the COVID-19, an objection you have to it is that**  
9 **you felt you weren't being given a choice? That it was**  
10 **being forced upon you?**

11 **A. I do feel that.**

12 **Q. And you say here that this was a violation of**  
13 **your privacy and basic human rights.**

14 **How did you feel that the COVID-19 vaccine**  
15 **mandate was a right to privacy?**

16 **A. I don't think I said that.**

17 **Q. Well, what did mean by -- when you say, This**  
18 **is a violation of my privacy?**

19 **A. Well, Amendment 7 says that I have a right to**  
20 **religious exemption, based on my convictions -- my**  
21 **God-given conviction. And my God-given conviction was**  
22 **that this vaccine was detrimental and that I shouldn't**  
23 **be forced between my career, my livelihood, and my body**  
24 **being harmed, potentially. I didn't want to take that**  
25 **chance.**

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1 MS. WOOD: Okay. Let's go back up to the very  
2 first page of this document.

3 (Complied.)

4 BY MS. WOOD:

5 Q. So this was the first e-mail that we looked at  
6 in this chain. The one dated October 12th, 2021 that  
7 you sent to Brenden Lim and copied Ms. Keene and other  
8 union reps.

9 And I want to look at the second paragraph of  
10 your e-mail, where you state that you never take the flu  
11 shot.

12 Is that still true?

13 A. I have never taken a flu shot.

14 Q. Is there a particular reason why you do not  
15 take the flu shot?

16 A. Well, one, you get the flu when you take the  
17 flu shot. And I didn't see where putting a different  
18 type of flu in me, every year, was going to be  
19 beneficial to my health, so I didn't want to take that.

20 Q. And then you also wrote there, "And today I  
21 choose not to take any medications because they have  
22 adversely affected my body and caused harm."

23 A. Yes.

24 Q. And we've already talked about your choice not  
25 to take medications, but I think the part we haven't

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1 addressed is this concept of adverse affects and harm  
2 caused to your body.

3 Can you please tell me what medications you  
4 believe have harmed you?

5 A. I can't really say for sure. All I know is  
6 that my body was broken down to the point where I became  
7 depressed. I didn't want to -- I gained weight. I felt  
8 hopeless. I wanted to clean my body up and I didn't  
9 want to continually be affecting one thing or another  
10 or -- you know, diminishing my health because of the  
11 effects of the different types of drugs that I was --  
12 might have been taking.

13 Q. And do you recall what drugs you were taking  
14 at the time that you were feeling those negative effects  
15 in your body? Do you recall?

16 A. I remember the Norco, because that was the  
17 pain medication that I was taking. There was some other  
18 things, but I can't think of them at this time.

19 Q. Okay. And so you stopped taking those drugs  
20 to alleviate what you thought were negative effects in  
21 your body; is that correct?

22 A. Correct.

23 Q. Now, I want to go back to the end of this  
24 document, Page 13. I think we got as far as Page 12.  
25 Just to look at the final parts of this document. I



MELODY FOUNTILA - July 21, 2023

1           A.    No. No. No. Nobody was returning to work.  
2   Not that -- not that I was privy to knowing. None of my  
3   coworkers -- we were all working from home. We weren't  
4   asked if we could come in to work from an office. That  
5   was not done.

6           Q.    Okay. During the pandemic, Bart Ellison was  
7   the program director for workforce development; is that  
8   correct?

9           A.    Yes.

10          Q.    And so he supervised the division that you  
11   worked under, right?

12          A.    Yes. Right.

13          Q.    And do you recall in August 2021,  
14   Mr. Ellison sending an e-mail to Human Services Agency  
15   staff indicating that staff would be returning on -- the  
16   workforce development division, returning to the office  
17   in September of 2021?

18          A.    I want to say maybe. I want to say, yeah.

19          Q.    And do you recall -- does it sound familiar to  
20   you that people were going to be asked to come into the  
21   office two days per week?

22          A.    Yep. Because I was -- yes.

23          Q.    Okay. And then did you also -- were you also  
24   aware that in September of 2021, the City's department  
25   of human resources had mandated that all staff work

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MELODY FOUNTILA - July 21, 2023

1 on-site at least two days per week?

2 A. Yes. I was aware of that.

3 \* Q Okay. I'm just going to check -- I may be  
4 close to being done here.

5 So before we close for the day, I do want to  
6 give you the opportunity to share what you discussed on  
7 break.

8 So I'm going to ask you again. We have taken  
9 several breaks. I know the last one you did not speak  
10 with Counsel, but on the first -- I believe it was three  
11 breaks you did speak with Counsel.

12 Will you please tell me the substance of what  
13 you discussed with your counsel during those breaks?

14 MR. DAVIS: Objection. Attorney-client  
15 privilege.

16 Do not answer the question.

17 BY MS. WOOD:

18 Q. Will you follow your attorney's instruction  
19 not to answer?

20 A. Yes.

21 MS. WOOD: Okay. And we will be moving to  
22 compel this, consistent with both Judge White's order  
23 and decisions issued in the Northern District of  
24 California.

25 That is all the questions I have for today, so

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## 1 CERTIFICATE OF DEPOSITION OFFICER

2  
3 I, ANGIE M. MATERAZZI, CSR No. 13116, duly  
4 authorized to administer oaths Pursuant to Section  
5 2093(b) of the California Code of Civil Procedure,  
6 hereby certify that the witness in the foregoing  
7 deposition was by me duly sworn to testify to the truth,  
8 the whole truth and nothing but the truth in the  
9 within-entitled cause; that said deposition was taken at  
10 the time and place therein stated; that the testimony of  
11 the said witness was reported by me remotely and  
12 thereafter transcribed by me or under my direction into  
13 typewriting; that the foregoing is a full, complete and  
14 true record of said testimony; and that the witness was  
15 given an opportunity to read and correct said deposition  
16 and to subscribe the same.

17 I further certify that I am not of counsel nor  
18 attorney for either or any of the parties in the  
19 deposition and caption named, or in any way interested  
20 in the outcome of the cause named in said caption.

21 I hereby certify this copy is a true and  
22 exact copy of the original.

23 Date: July 27, 2023

24   
25 \_\_\_\_\_  
ANGIE M. MATERAZZI, CSR 13116

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# EXHIBIT 2

SELINA KEENE - July 24, 2023

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

--oOo--

SELINA KEENE, MELODY FOUNTILA,	)	Case No.
MARK McCLURE,	)	4:22-cv-01587-JSW
	)	Related Case Nos.:
Plaintiffs,	)	4:22-cv-03975-JSW
	)	4:22-cv-04319-JSW
vs.	)	4:22-cv-04633-JSW
	)	4:22-cv-06013-JSW
	)	4:22-cv-07455-JSW
	)	4:22-cv-07645-JSW
CITY AND COUNTY OF SAN FRANCISCO;	)	4:23-cv-00211-JSW
LONDON BREED, MAYOR OF	)	
SAN FRANCISCO IN HER OFFICIAL	)	
CAPACITY; CAROL ISEN, HUMAN	)	Volume I
RESOURCES DIRECTOR, CITY AND	)	
COUNTY OF SAN FRANCISCO, IN HER	)	
OFFICIAL CAPACITY; DOES 1-100,	)	
	)	
Defendants.	)	
	)	Pages 1 - 125

DEPOSITION BY ZOOM OF

SELINA KEENE

JULY 24, 2023

REPORTED BY:

ANGIE M. MATERAZZI, CSR 13116

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JAN BROWN & ASSOCIATES

WORLDWIDE DEPOSITION & VIDEOGRAPHY SERVICES

701 Battery St., 3rd Floor, San Francisco, CA 94111

(415) 981-3498 or (800) 522-7096

SELINA KEENE - July 24, 2023

1                                   A P P E A R A N C E S  
2 (ALL PARTIES APPEARING VIA VIDEOCONFERENCE)  
3 FOR THE PLAINTIFFS:

4                   BY: RUSSELL DAVIS, ESQ.  
5                   PACIFIC JUSTICE INSTITUTE  
6                   29 LAKEWOOD AVENUE  
7                   SAN FRANCISCO, CALIFORNIA 94127  
8                   Tel: 415.310.6575  
9                   Email: RDAVIS@PJI.ORG

10                   FOR DEFENDANT CITY AND COUNTY OF SAN FRANCISCO:

11                   BY: LAUREN WOOD, ESQ.  
12                   OFFICE OF THE CITY ATTORNEY  
13                   1390 MARKET STREET, 5TH FLOOR  
14                   SAN FRANCISCO, CALIFORNIA 94102  
15                   Tel: 415.554.4261  
16                   Email: lauren.wood@sfcityatty.org

17                   FOR PLAINTIFF DAVID GOZUM:

18                   BY: ARKADY ITKIN, ESQ.  
19                   LAW OFFICE OF ARKADY ITKIN  
20                   57 POST STREET, SUITE 812  
21                   SAN FRANCISCO, CALIFORNIA 94104  
22                   Tel: 415.640.6765  
23                   Email: arkady@arkadylaw.com

24                   FOR PLAINTIFF DENISE DEBRUNNER:

25                   BY: JOHN C. SULLIVAN, ESQ.  
                  SL LAW, PLLC  
                  610 UPTOWN BOULEVARD, SUITE 2000  
                  CEDAR HILL, TEXAS 75104  
                  Tel: 469.523.1351  
                  Email: john.sullivan@the-sl-lawfirm.com

                  ALSO PRESENT:

                  DAVID GOZUM, PLAINTIFF  
                  O'BRYANT MURALLES, DEPO TECHNICIAN

SELINA KEENE - July 24, 2023

1 BE IT REMEMBERED that, pursuant to Notice of  
2 Taking Deposition, and on Monday, July 24, 2023,  
3 commencing at 10:03 a.m. thereof, before me, ANGIE M.  
4 MATERAZZI, a Certified Shorthand Reporter, personally  
5 appeared remotely

6 SELINA KEENE

7  
8 called as a witness by the Defendant, who, having been  
9 first duly sworn, was examined and testified as follows:

10 --oOo--

11 EXAMINATION BY MS. WOOD

12 Q. Good morning, Ms. Keene. My name is Lauren  
13 Wood and I'm a deputy city attorney with the  
14 San Francisco City Attorney's Office and I'm  
15 representing the City and County of San Francisco in  
16 this matter.

17 A. Okay.

18 MS. WOOD: Would the other attorneys like to  
19 state their appearance?

20 MR. DAVIS: Yeah. This is Russell Davis for  
21 plaintiff, Ms. Keene.

22 THE WITNESS: Hi, Russell. How are you doing?

23 MR. DAVIS: Hi. How are you doing?

24 BY MS. WOOD:

25 Q. Ms. Keene, have you ever been deposed before?

SELINA KEENE - July 24, 2023

1 and County of San Francisco in August of 2005, correct?

2 **A. That is correct. I was eligibility worker.**

3 Q. And during this deposition, just for the sake  
4 of brevity, I will often refer to the City and County of  
5 San Francisco as just the City.

6 If I do that, will you understand that I mean  
7 your former employer, the City and County of --

8 **A. Yes.**

9 Q. -- San Francisco?

10 **A. Yes, I do.**

11 Q. Great. That just makes it -- makes it easier.

12 THE REPORTER: Ms. Keene, please wait until  
13 she's finished with her question. You keep jumping in.

14 THE WITNESS: I thought she was finished.

15 MS. WOOD: That's okay. Sometimes my  
16 questions are long. We'll work on it. We'll get there.

17 BY MS. WOOD:

18 **Q. So you mentioned your first position was as an**  
19 **eligibility worker in the family and children's foster**  
20 **care program, correct?**

21 **A. Correct.**

22 **Q. And then it lists in your declaration some of**  
23 **your duties. It was with providing eligible foster**  
24 **parents and foster care providers with helping them get**  
25 **their monetary and other medical benefits and support**

17



SELINA KEENE - July 24, 2023

1 for their foster children?

2 A. Yes.

3 Q. Is there -- were there other duties that you  
4 had that you recall?

5 A. In regards to what position?

6 Q. The eligibility worker position.

7 A. Just deeming them eligible every month, making  
8 sure that they had all of their benefits for the foster  
9 children. I did not interact, in a physical way, with  
10 the foster parents. That wasn't part of my duties. The  
11 eligibility portion is just to ensure that they qualify  
12 for the benefit and then receive the benefit, and then I  
13 do the calculations every month.

14 Q. So was it more of an administrative function  
15 that you were providing?

16 A. Yes, it was more administrative.

17 Q. And if we go up to Paragraph 2, you noted in  
18 your declaration, "I was always interested in helping  
19 people, especially those in need and underserved or and  
20 underrepresented."

21 Do you see that?

22 A. Yes.

23 Q. Do you feel that your work as an eligibility  
24 worker for the family and children's foster care program  
25 fulfilled that desire to help people?

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1           **A.     Yes, I did.**

2           **Q.     In what ways?**

3           **A.     Benefiting them, making sure that they were**  
4 **self-sufficient.**

5           Q.     And then after spending somewhere between one  
6 and two years in the -- as an eligibility worker, you  
7 moved over to the Human Services Agency in 2007; is that  
8 correct?

9           **A.     Correct.**

10          Q.     Do you recall when in 2007 you switched  
11 positions?

12          **A.     It could have been March.**

13          Q.     Okay. And you noted in your declaration that  
14 your job classification was 9704 Employment & Training  
15 Specialist III.

16                 Is that the only other classification you've  
17 held with the City, other than the eligibility worker?

18          **A.     Correct.**

19          Q.     Was this a full-time civil service position?

20          **A.     Correct.**

21          Q.     And I know that you did, in your declaration,  
22 you know, describing some of your job duties, but for us  
23 on the record here today, could you just briefly  
24 describe what your, sort of, main role and function was  
25 as an employment and training specialist?

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1 know, so their income was so low that they qualified for  
2 food stamps, which I actually qualified them to get into  
3 the program for us to help assist them with employment  
4 opportunity.

5 Q. Okay. I want to focus on sort of before  
6 COVID, so, like, late 2019, very early 2020 and before.  
7 I understand how things operated at work changed,  
8 obviously, once everything shut down.

9 So in sort of pre-pandemic, do you have an  
10 approximation of, sort of, how many different  
11 individuals or clients you had on your caseload at any  
12 given time?

13 A. Goodness. You got to talk about -- so at any  
14 period, if you go all the way back to the beginning from  
15 when I first started with the agency, I could have  
16 up to -- anywhere from 20 to 30 people that I would  
17 service per month and, of course, that changed. And  
18 then sometimes it gradually went down to maybe 15, 12,  
19 and so -- yeah. And then after -- you know, that's all  
20 before the pandemic -- yeah, the pandemic.

21 Q. Okay. And you had mentioned a little bit  
22 about some of the meetings. So it sounds like you were  
23 meeting with people in person prior to the pandemic.

24 How often were you having in-person meetings  
25 with clients?

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1           A.    Prior to the pandemic, it was every day. So  
2 we had classes every day. Each client is responsible  
3 for so many hours per week that they have to  
4 participate. It depended on the family makeup. Some  
5 people were single, some had children. But like I said,  
6 it depended on the eligibility worker for the program  
7 that referred them into our employment program that  
8 would determine how many hours that they would  
9 participate per week.

10          Q.    Okay. And in terms of your desire to help  
11 people, I assume that working at the Human Services  
12 Agency in this capacity fulfilled that desire?

13          A.    It did. It did.

14          Q.    And are you -- between the employment and  
15 training specialist position and the eligibility worker  
16 for foster care, have you ever worked for the City?

17          A.    No.

18          Q.    And then in Paragraph 2 of your declaration,  
19 it says that prior to working for the City you worked  
20 for the Ella Hill Hutch Community Center as a  
21 construction apprenticeship coordinator from 1998 to  
22 2004.

23          A.    Uh-huh.

24          Q.    Could you briefly explain what your role and  
25 duties were when you worked at the Ella Hill Hutch

23

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1 Community Center?

2 A. That was also putting individuals from the  
3 community to work. That actually was specified in -- to  
4 the construction side of the house. It wasn't general  
5 employment. Those were actual careers -- individuals, I  
6 actually guided them, had them tested to identify their  
7 levels of able -- the ability to get into the trades.

8 And so we had apprenticeships that we would  
9 help them test. And then if there was a nonlist trade,  
10 say if it was something like carpentry or painting,  
11 laborer, things of that nature, they could get into  
12 those particular trades as apprentices. And then as  
13 long as they stayed within that capacity, working and  
14 building their skill level, then they would journey out.

15 And so then my partner would take over,  
16 because he was the journeyman coordinator for Ella Hill  
17 Hutch. So we tag-teamed to get community individuals  
18 into an actual career of construction. And that  
19 depended on their abilities, their passion for the type  
20 of work.

21 Q. Did you find this work rewarding when you were  
22 there?

23 A. I totally did. I loved the work,  
24 especially -- especially working with contractors. When  
25 the contractors came, it was always -- we worked with

24

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1 the redevelopment agency to ensure that the contractors  
2 hired from the community. And, basically, they had to  
3 hire half -- half their crews had to come from our  
4 agency, so it made our jobs a lot easier.

5 Q. And were the individuals who were coming to  
6 seek services from Ella Hill Hutch Community Center,  
7 were those people that you would consider underserved to  
8 or underrepresented?

9 A. Yes.

10 Q. In what ways?

11 A. A lot of them hadn't been working. Some of  
12 them were, you know, between jobs, some of them were low  
13 income, had been on welfare, and they just wanted a  
14 change. They basically wanted to change. They wanted  
15 to upgrade their skills, so that was a perfect  
16 opportunity for them to be able to accomplish that.

17 Q. Would it be fair to say that the type of work  
18 that you did at Ella Hill Hutch Community Center was  
19 similar in some ways to the work you did at the City, in  
20 that you were helping people who had certain  
21 disadvantages, you know, find meaningful job  
22 opportunities?

23 A. Mostly definitely.

24 MS. WOOD: We can take down this exhibit.

25 (Complied.)

25

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1 those?

2 A. I was not able to do that.

3 Q. What was your focus of study when you were at  
4 each of those schools?

5 A. Human studies.

6 Q. Have you taken any other college courses?

7 A. No, not since then. I've been working and  
8 focusing on my career, helping others, so I haven't had  
9 the opportunity. I'm sorry. I did -- during the time I  
10 worked for -- I'm sorry. I did work for PIC for -- at  
11 one time in between -- right underneath the eligibility  
12 worker, I worked for PIC. And then at the same time, I  
13 was working for United, part-time.

14 Q. What were you doing at PIC?

15 A. Same capacity like I'm doing now. The  
16 homeless program there.

17 Q. And then you worked at United?

18 A. I was working for United during that time.

19 Q. Do you have any technical training or  
20 certificates that you've received?

21 A. I did -- oh, my God. That was a long time --  
22 I did. Do you know how old I am? Let me go back. I  
23 believe -- I did a computer program and course at  
24 Southeast, but that was way back in the early '90s. And  
25 I haven't done any other technical classes, except for

27

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1 speaking objection.

2 MR. DAVIS: I didn't instruct her how to  
3 answer the question, Counsel. That's a speaking  
4 objection. I did not -- did not make a speaking  
5 objection.

6 Please continue.

7 MS. WOOD: My understanding of a speaking  
8 objection, you know, anything other than just a short  
9 statement as a basis for it, so -- but...

10 MR. DAVIS: My understanding of speaking  
11 objection is instructing the witness how to respond to a  
12 question, via the use of the objection. That's my  
13 understanding.

14 Anyway. Let's continue, please.

15 BY MS. WOOD:

16 Q. All right. Ms. Keene, are you currently  
17 employed anywhere?

18 A. No, I'm not.

19 Q. Have you applied for any jobs since the time  
20 that you retired from City service last spring?

21 A. No, I have not.

22 Q. Is there a reason why you haven't looked for a  
23 new job?

24 A. Because I'm still dealing with my -- well, I'm  
25 still waiting. I guess, I'm hoping that I can get my



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1 job back, you know, my career back, my profession, my  
2 passion. You know, I want that back.  
3 I don't -- you know, I have been suffering  
4 from my chronic issues and -- you know, that's been  
5 the -- the anxiety and the stress has also been a  
6 factor. But in reality, I would love to have my career  
7 back helping people, doing what I've been doing almost  
8 30 years.

9 Q. Now, Ms. Keene, when we were looking at your  
10 declaration, you had noted that the timeline didn't  
11 include the time you were out on disability at the end  
12 of your employment with the City.

13 Do you recall the approximate dates you were  
14 out on disability?

15 A. I had been out since the 27th of October, when  
16 I had an atrial fib attack. I suffer from Afib since --  
17 and that's noted with the City. They have all of my  
18 FMLA paperwork. I have several chronic conditions. And  
19 FMLA paperwork goes back to maybe 2009.

20 And so this latest condition arised in 2017  
21 and they have been aware of that. And as part of --  
22 also with my anxiety disorder. So when -- when I get  
23 overly stressed, then I end up having an episode of  
24 Afib.

25 And I was definitely going through a lot of

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1 job, I can perform my duties.

2 You know, working with my -- with the  
3 population -- my population, as I used to call it, never  
4 used to stress me out. So it was just the other  
5 bureaucracy that would be a problem, you know, dealing  
6 with the agency, as a whole, because it was just so much  
7 going on.

8 Q. Thank you for that explanation.

9 Do you have any knowledge as to whether other  
10 Bay Area counties or cities also have a Human Services  
11 Agency that provides similar employment-related programs  
12 to that which San Francisco provides?

13 A. They do out here in Contra Costa.

14 Q. And you live in Contra Costa County, correct?

15 A. Yes, I do.

16 Q. Did you look into -- see whether any other  
17 counties, such as Contra Costa County, had open  
18 positions doing similar work as what you've been doing  
19 with San Francisco?

20 A. When would you need -- I need to know when was  
21 the period that you expected me to look for it.

22 Q. Oh. From the time you left City employment,  
23 so April of 2022 to the present.

24 A. No. I had been not been really looking  
25 elsewhere.

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1           **A.     They are J.J., which equals Johnson & Johnson,**  
2           **Moderna and Pfizer.**

3           Q.     For my next questions, if I use the term  
4           COVID-19 vaccines, that general term, I want you to  
5           understand that I'm asking about all three U.S.  
6           vaccines, Pfizer, Moderna, Johnson & Johnson,  
7           collectively.

8                     Does that make sense?

9           **A.     It does. But then the vaccine, unfortunately,**  
10          **as far as my understanding, the information that I've**  
11          **understood, is that not all of them are vaccines.**

12                     So I'm -- we can use that as a terminology for  
13          now, but as far as my understanding, they're not all  
14          licensed as vaccines.

15          Q.     Okay. Thank you for that clarification.

16                     And then if I -- if my question is directed to  
17          a particular COVID-19 vaccine, I'll use the name Pfizer,  
18          Moderna Johnson & Johnson. And if the answer you're  
19          given -- the information you're conveying is specific to  
20          a specific vaccine, I would ask that you also identify  
21          it by name, so we have a clear record.

22                     Does that make sense?

23          **A.     Yes.**

24          Q.     Okay. Great. Thank you. Now, in 2021, after  
25          the City and County of San Francisco issued their

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1 vaccine policy, did you have concerns about the safety  
2 of any of the three COVID-19 vaccines?

3 A. Yes.

4 Q. Did you have concerns about all three?

5 A. Yes.

6 Q. And did the safety concerns that you had, were  
7 they the same for all three or were they all different?

8 A. Same.

9 Q. Could you tell me, what were the safety  
10 concerns that you had about the three COVID-19 vaccines?

11 A. The data wasn't available about the safety;  
12 that was one. Two, the time frame that it took, which  
13 was remarkably too short. Generally, they all are  
14 supposed to be tested over a 10-plus-year period of time  
15 and they weren't. That's the normal form, as far as I  
16 know, of -- of making sure -- how they develop vaccines.  
17 And then the other thing was -- is that they only  
18 actually licensed the name of COMIRNATY, which was part  
19 of Pfizer's, and COMIRNATY not ever available in the  
20 United States.

21 If you look at any of the vials that were  
22 utilized, as far as what the news used to say, none of  
23 them said COMIRNATY. So -- that was the only one that  
24 was licensed. Everything else, to my understanding, was  
25 emergency use only.

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1 And if it's experimental, emergency use, then  
2 you should have the ability to say yes or no to  
3 something that you don't know anything about or the  
4 ingredients of.

5 Q. So the first thing you mentioned there was a  
6 lack of available data related to safety; is that  
7 correct?

8 A. Correct. Because I was looking for it. You  
9 know, I looked for it and I didn't get any. And I asked  
10 individuals who went and got it, Did they receive it,  
11 because when you're getting ready to get some drug like  
12 this, you're supposed to get information. And a lot of  
13 people said that they had not gotten any information, so  
14 that was a red flag right there.

15 Q. Okay. And do you recall the time period in  
16 which you were searching for safety data related to the  
17 three vaccines?

18 A. I think that started when they started  
19 pushing. I think that was like July -- June, July of  
20 2021, I think -- or it was actually -- I think they  
21 started giving it -- if I'm not mistaken, I think they  
22 started giving shots, voluntarily, I think end of 2020  
23 or -- I can't remember. But -- I can't remember. But  
24 it was -- it was 2021, like June, July when the City  
25 started -- all of a sudden they started to turn. I

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1 said, Oh, wait a minute. Hold on. What's going on?

2 And so that's when I started paying attention  
3 to the news and trying to find alternate news sources to  
4 get information. And then I was asking family and  
5 friends. They were like, No, they didn't give me  
6 anything. They just gave me a shot. I was like, What?  
7 That's not the way it's supposed to work.

8 Because usually any drug comes with  
9 instructions, even the drugs that I take have the  
10 instructions and it has a -- it has an insert in there  
11 and it gives you, like, ingredients and stuff. And they  
12 weren't doing that.

13 And even when they were announcing, Go take  
14 it, go take it, go take it -- most, if not all, drug  
15 commercials that come on TV always talk side effects.  
16 One thing that this COVID did not -- it did not talk  
17 about side effects, what it can cause, none of that.  
18 It's -- all the commercials didn't do that. So they  
19 were in violation right there for not being -- having  
20 disclosure or transparency. So, again, that was a red  
21 flag.

22 Q. When you say that was a red flag, the lack of  
23 available information and safety data, is that a reason  
24 that you did not want to get the vaccine?

25 A. No. The reason why is because once I found

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1 out that fetal cells was involved, that's when I said,  
2 No. That's definitely something -- but so it was -- it  
3 was adding a factor, but it wasn't the primary.

4 Q. Let's say hypothetically there were no fetal  
5 cells at all in the vaccine, would you have still gotten  
6 it, given the lack of available safety data?

7 MR. DAVIS: Objection. Calls for speculation.

8 THE WITNESS: I don't know if I would have  
9 gotten it. Because, again, it was created in a too  
10 short period of time. It's something that you have to  
11 be concerned -- and if you got a lot of common sense,  
12 anybody would be concerned about that.

13 BY MS. WOOD:

14 Q. Okay. So let's see. So there were a few  
15 other reasons -- or a few other safety concerns you  
16 mentioned.

17 The one you just now touched on again, that  
18 the development was too rapid. That normally, in your  
19 understanding, a vaccine would take ten or more years to  
20 develop and so that was a concern for you, correct?

21 A. Correct.

22 Q. So given that -- so I'm going to go back to  
23 the same hypothetical.

24 If there were no fetal cells used in any of  
25 the testing or production of the vaccine, given that

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1 they were rapidly developed in -- I think it was maybe a  
2 year or so, would you still have objected to taking the  
3 vaccine because of the very rapid development?

4 MR. DAVIS: Objection. Asked and answered.  
5 Go ahead.

6 MS. WOOD: So this is specifically as to time  
7 frame of the development is my question.

8 MR. DAVIS: She answered your question.  
9 But go ahead and answer it again.

10 THE WITNESS: Response is the same and -- to  
11 what I just said. It would -- it would definitely be a  
12 problem.

13 BY MS. WOOD:

14 Q. Okay. Thank you. Now, you had mentioned that  
15 the only one that was licensed was COMIRNATY.

16 And so it's your understanding that that  
17 COMIRNATY was not available in the U.S.?

18 A. Correct.

19 Q. And where did you get the information that  
20 informed you that COMIRATY was not available in the U.S.?

21 How do you know that?

22 A. Several new sources, media.

23 Q. Do you recall the names of any of those news  
24 sources that you --

25 A. Not offhand, no.



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1 they were providing?

2 A. Well, yeah, I was checking the history, their  
3 background, things of that nature. Like, for instance,  
4 Dr. Robert Malone, he's the creator of the SARS of  
5 COVID, initial, when it first came out in the '80s.

6 So he was definitely talking -- he was on  
7 several shows. Of course -- unfortunately, because of  
8 who owns legacy media, you know, he wasn't able to speak  
9 there and talk to the masses.

10 But because there was a narrative about  
11 everybody getting the -- that's where the red flag also,  
12 for me, was going up. Because I said, Wait a minute.  
13 How come -- because everything has two sides of the  
14 story and then it's the truth. So why is it that both  
15 sides of the story is not being explained on regular  
16 news media? Why is everybody in sync, lock step, saying  
17 the same message over and over again? Because that's  
18 not the way this works. Everybody has an opinion. You  
19 have two arguments and then they come to a conclusion.  
20 But the way the media has been pushing it, it was  
21 nothing but one-sided.

22 And so I -- everybody who -- like I said, you  
23 know, I'm part of Baby Boomers or whatever, common  
24 sense. Anybody with common sense would say, Hey, why  
25 aren't they talking about the other side? Why aren't

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1 they allowing other doctors to have input. Why are we  
2 only seeing, for instance, Fauci? So that was a problem  
3 for me, so -- yeah. So I had to look and find other  
4 resources.

5 Q. I just want to make sure I'm understanding  
6 you.

7 So would it be fair to say that the sort of  
8 absence of, what you say, both sides in sort of the  
9 conventional media caused you to have concern about the  
10 COVID-19 vaccine?

11 A. Yes.

12 Q. Did you have concerns that -- any specific  
13 concern that the vaccine -- the COVID-19 vaccines would  
14 be detrimental to your health if you took them?

15 A. Well, spiritually, they were detrimental.  
16 Because after finding out about the fetal cell  
17 involvement, the murder that they utilize to create the  
18 vaccines, that -- that put me in another place. And I  
19 said, There's no way that I would accept anything in my  
20 body that was derived from that. So that was -- I  
21 just -- you know, that's what I felt. That's where I  
22 was. And so -- you know, it wasn't healthy.

23 Unfortunately -- you know, then you started  
24 hearing about deaths and -- from causes. And, you know,  
25 not deaths just because somebody had COVID, because I

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1 had COVID and I survived it. It was only 1 percent of  
2 people who actually passed from the actual COVID. And a  
3 lot of that had to do with protocols -- bad protocols in  
4 hospitals.

5 But at the end of the day, then -- once the  
6 vaccine -- so-called vaccines came into the picture and  
7 people started dying or having adverse reactions -- and,  
8 again, that wasn't being advertised in the media -- that  
9 became a major, major problem, so -- yeah.

10 Q. So did you believe that if you were -- setting  
11 aside your spiritual objection to it. Did you feel that  
12 if you were to take the COVID-19 vaccine, that the risk  
13 of physical harm or death or injury would be too great?

14 A. Yes. Because I already had preexisting  
15 conditions that could do that anyway, so I didn't need  
16 any help.

17 Q. And in terms of the information about the  
18 vaccine reactions or injuries or deaths, what -- where  
19 did you get that information from?

20 A. My alternative resources when stuff started  
21 coming out, because they were hiding it in the  
22 mainstream and that was -- here you go again with the  
23 narrative. Everybody is trying to get you to take  
24 something that's going to cause you harm. Yeah,  
25 that's -- yeah.

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1 Q. So even -- so let's say, hypothetically, there  
2 was no use of fetal cell lines in the production or  
3 development of it. Would you still have objected to  
4 getting the COVID-19 vaccine --

5 MR. DAVIS: Objection --

6 MS. WOOD: Let me finish my question.  
7 Russell, let me finish.

8 BY MS. WOOD:

9 Q. Okay. I'll start over. It's a different  
10 question.

11 So, hypothetically, if the COVID-19 vaccine  
12 did not have any fetal cell lines used in the production  
13 or the development, would you still object to getting  
14 the COVID-19 vaccine because of the number of adverse  
15 reactions, deaths, injuries to the vaccine?

16 MR. DAVIS: Objection. Asked and answered.  
17 This is now the third time you've asked the same  
18 question, phrasing it slightly different --

19 MS. WOOD: Will you stop with the speaking  
20 objections?

21 MR. DAVIS: Stop harassing my client.

22 MS. WOOD: I'm not harassing. This is a  
23 different question. It's asking --

24 MR. DAVIS: It's not.

25 MS. WOOD: Yes, it is. And please stop with

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1 question, okay? You need to calm down, all right? If  
2 you can calm down. I'm a Taylor Swift fan. We could  
3 listen to the song.

4 (Record read as requested.)

5 MR. DAVIS: Calls for speculation.

6 THE WITNESS: So let me just say that it is my  
7 right -- my constitutional right whether or not to take  
8 something that is appropriate or not into my body.

9 And without enough information, as well as the  
10 adverse effects that has happened, no, I would not have  
11 jumped up and took a jab for that -- for those vaccines.  
12 Because it was -- they are endanger -- they are  
13 endangering lives and causing harm, so I would not want  
14 to put myself into that situation. Especially with my  
15 own medical history, I do not need help to die, so there  
16 you are.

17 BY MS. WOOD:

18 Q. Thank you for that answer. I appreciate it.

19 So you mentioned earlier this morning and also  
20 it's in your declaration that you did come down with  
21 COVID-19 in January of 2022, correct?

22 A. Correct.

23 Q. And if you need me to -- actually, let's bring  
24 back up your declaration and that's Exhibit 2 and we can  
25 look at Paragraph 12.

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1     **remember.**

2           Q.     You didn't take any fever-reducing medication,  
3     like aspirin, ibuprofen or acetaminophen?

4           A.     **No.**

5           Q.     Paragraph 12, the last sentence says, "I have  
6     since recovered and now have natural immunity to the  
7     disease."

8                     What is your understanding of what it means to  
9     have natural immunity to COVID-19?

10          A.     **That is when your body obtains the virus and**  
11     **the virus then -- the white blood cells that fight it**  
12     **off end up, like, duplicating, where they can**  
13     **actually -- if it ever enters your body again, they can**  
14     **help fight it off.**

15          Q.     And I think you mentioned earlier that you got  
16     some type of antibody test --

17          A.     **Yes, I did.**

18          Q.     Do you remember when you had that test done?

19          A.     **That was at the end of January -- either the**  
20     **end of January or beginning of February; one of the two.**

21                     And I actually went down to the -- there's a  
22     lab that I go to -- because I'm with UC -- UC is in  
23     San Francisco. They don't have a facility out here. So  
24     when I get my blood work, I go down the street to the  
25     lab. And I went and got an antibody test. Talked to my

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1 doctor and had her set it up. She sent over the request  
2 and I took the antibody test.

3 Q. Do you believe that natural immunity is more  
4 effective than vaccination in preventing the  
5 transmission of COVID-19?

6 A. I do. I understand that through a lot of the  
7 information that came across alternative methods. And  
8 even the CDC mentioned that the -- natural immunity --  
9 they finally, after months and months and months,  
10 recognized natural immunity and said it was 22 times  
11 better than the vaccine, so...

12 Q. So when you mentioned that -- this 22 times  
13 more effective figure, where was that -- where did you  
14 get that particular statistic from?

15 A. That was -- I think -- well, between CDC and  
16 other news reports. As a matter of fact, I think at one  
17 point -- one of the people that I would watch, too, was  
18 Facts Matter with Roman. He's a news reporter that I  
19 got a lot of information from as well. Especially when  
20 they had breaking news about natural immunity and things  
21 that were better, as well as the reports of the adverse  
22 events that were happening to people from getting these  
23 so-called vaccines, so -- yeah.

24 Q. Do you recall approximately when it was that  
25 you were reviewing this information related to natural

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1 immunity?

2 A. Well, as I -- you know, depending on --  
3 generally, it was -- actually, I think it was a little  
4 bit before I caught COVID, so that might have been in  
5 November or December of 2021. And then it was -- at one  
6 point after I caught COVID or right at the end stages, I  
7 started looking at stuff, because --

8 You know, at that point, when I ended up  
9 having COVID, I notified my -- notified the employer and  
10 let them know. I sent them information. I sent them my  
11 actual -- my antibody test, so the City had all of that.  
12 So I wasn't a danger to anybody.

13 So -- so at the end of the day, you know,  
14 everybody that they wanted back at the site on  
15 November 1st, who were vaccinated -- I started getting  
16 reports about people who were getting COVID. So they  
17 was spreading it all around like it was a thing to do at  
18 work, even though they were vaccinated. So that wasn't  
19 helping.

20 Q. Did you think it was unfair that the City  
21 required you to get vaccinated for COVID-19 after you  
22 had already been infected?

23 A. I definitely thought it was unfair. I totally  
24 thought it was unfair and -- especially with people  
25 passing it around at work. I was working telecommuting.

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1 I wasn't going to impact anybody, nobody. So -- so it  
2 was -- when they denied me, I was like, What is wrong  
3 with them? You know, first they violated my Title VII  
4 rights and then here comes my medical and I'm having  
5 problems, and so it was -- it's just ridiculous. It was  
6 ridiculous. And then they're trying to enforce  
7 something that's not a law. It's not passed by  
8 Congress. So who do they think they are? You're trying  
9 to coerce people to do something that's going to harm  
10 them and think that you're not going to be held  
11 accountable. That's not good.

12 My job turned into not having any integrity  
13 and wasn't being held accountable. They weren't being  
14 transparent, so it was -- it's a major problem. I had a  
15 major problem with that.

16 Q. And when you made your request for a medical  
17 exemption, did you make that request on the basis of  
18 having natural immunity to COVID due to prior infection?

19 A. That too, yes. I didn't need to do that in  
20 order to perform my job. We had been performing our  
21 jobs even with COVID, in-person. There was still people  
22 that was there before they even required -- listen. All  
23 the City and County -- all the City and County employees  
24 were working with COVID going on, okay? So it didn't  
25 make any sense. All of a sudden now you want somebody

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1 to take a shot that doesn't even -- that's not  
2 guaranteed -- it's not factual that it's safe and  
3 effective. Didn't have any data that it was safe and  
4 effective. They just kept on saying, Oh, it's safe and  
5 effective, it's safe and effective. What does that  
6 mean, really? Where's your backup? Nobody provided it.  
7 So it didn't make any sense. So everybody is acting  
8 like no -- common sense is out the window.

9 So, yeah, I was really, really -- excuse my  
10 expression -- pissed off, because now you're  
11 interrupting my career, my profession, my passion  
12 because of some bologna stuff, that you don't have no  
13 proof that it even works, and it didn't work.

14 Q. Thank you for that.

15 MS. WOOD: I think now -- since we've been  
16 going for an hour and 20 minutes, let's take a short  
17 break.

18 How about we come back in ten minutes? Does  
19 that work for everyone?

20 MR. DAVIS: Okay.

21 (Off the record at 11:19 a.m. and back  
22 on the record at 11:31 a.m.)

23 BY MS. WOOD:

24 Q. All right. Ms. Keene, I want to talk a bit  
25 about your job and job duties during the pandemic now.

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1 driving two hours, drive home two hours. I did not miss  
2 that. So -- yeah. That was -- that was the good thing.  
3 Just be ready for work like you normally would, but  
4 you're at home.

5 It's ironic, because I -- I wanted -- I tried  
6 to get that a long time ago, but then all of a sudden  
7 here's, you know, COVID and then that -- it created that  
8 environment, so -- yeah.

9 Q. Now, were all of the clients of the Human  
10 Services Agency served, were they all able to meet  
11 virtually or did you have some that didn't have access  
12 to, like, a phone or a computer or Internet?

13 A. Most of them all had phones, but not everyone  
14 had computers, so that was challenging.

15 When there was -- I believe they had -- you  
16 know, they could go down to -- because 170 Otis was  
17 open. I think they had like a skeleton crew coming in  
18 there, but that was way after everybody was sheltered in  
19 place. I think everything just kind of got closed up  
20 first. And then they had disaster workers that --  
21 whoever was a disaster worker, they were dispatched to  
22 certain areas to help assist clients, the underserved  
23 population. And then our department tried to continue  
24 on as usual with helping with jobs and stuff.

25 But it was -- all that was kind of hard,

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1 because the COVID also closed businesses down, you know,  
2 so people -- you know, employers couldn't even hire  
3 because, you know, they were told to -- like, you can't  
4 have anybody come to your business, so it was definitely  
5 a negative impact on everyone.

6 Q. Do you recall in November 2020, the Human  
7 Services Agency opening -- or reopening its campus at  
8 1320 Mission Street?

9 A. I cannot recall whether or not they opened. I  
10 know eventually they did, but I can't remember if it was  
11 in November.

12 Q. Okay. But do you recall them opening at some  
13 point in 2020?

14 A. Wait a minute. At some point in 2020. I just  
15 don't know exactly when that was. It could have been  
16 2020 or 2021, one of the two. I -- like I said, it  
17 was -- if they did, it was a very big skeleton crew,  
18 hardly anybody there, because they were in fear of  
19 people catching COVID from each other.

20 And then I think -- I did know that  
21 eventually -- and I still can't -- call the times, the  
22 date or the year, but I do remember -- you know, any  
23 clients that -- in retrospect to, like, not having a  
24 computer, that they would have to make an appointment to  
25 go in in order to get access to a computer.

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1 Q. Okay. So you're not sure exactly when --

2 A. At some point, yeah. Like I said, I can't --  
3 don't even get me started. I can't remember the dates.

4 Q. That's fine. Do you know how this, sort of,  
5 limited reopening for these appointment-only visits was  
6 staffed? Was it by volunteers or do you have any  
7 knowledge about that?

8 A. Well, I'm not management, so I don't -- I  
9 can't recall that. I can't recall what they did. You  
10 know, I wasn't in charge of that, so, unfortunately,  
11 yeah -- no.

12 Q. That's all right. Did you ever volunteer to  
13 come work on site when they had these limited in-person  
14 appointments?

15 A. No, I didn't go in. Because, again,  
16 driving -- I mean, it didn't make any sense. I think it  
17 was -- anybody that was more readily available that  
18 lived in the community that was closer by. I think that  
19 that -- I think they were, at that point, kind of fair  
20 about it, so -- yeah.

21 Q. Okay.

22 A. I just continued my work like I was doing,  
23 telecommute.

24 Q. Now, during the pandemic, was Bart Ellison the  
25 program director for workforce development at the Human

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1 Services Agency?

2 A. Yes.

3 Q. And so he was -- had -- I believe he wasn't  
4 your direct supervisor, but he was maybe --

5 A. He was -- he was over all of us. You know, we  
6 had our direct supervisors or manager -- direct  
7 supervisor, manager and then -- you know, then he was  
8 over all -- everybody, so -- yeah.

9 Q. Okay. Do you recall, in approximately August  
10 of 2021, Mr. Ellison sending an e-mail to all of the  
11 Human Services Agency staff announcing that the  
12 workforce development division would be returning to the  
13 service office in September?

14 A. I can't remember that. I -- I don't recall.  
15 I think eventually an e-mail did come out, but I cannot  
16 remember whether it came from him or whomever. I don't  
17 know. But sometimes stuff -- if it didn't go out to  
18 everybody -- he might have sent it to the managers and  
19 then the managers would send it to their teams, so --  
20 yeah. I can't quite remember that part.

21 Q. Okay. But do you recall that there was a time  
22 in the fall of 2021 when employees were being required  
23 to return on site two days a week?

24 A. I don't remember initially if it was two days  
25 or one day. I do remember that they were eventually

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1 going to be recalled. I think it was going to be a  
2 rotation. I do remember that. But I don't know if it  
3 was actually two or one day a week. I thought it was,  
4 like, initially one day a week and then they were going  
5 to increase it to two days.

6 Q. In 2021, did you ever return to any on-site  
7 work?

8 A. No, I did not. I was still telecommuting.

9 Q. And was that because to return to on-site work  
10 you need to be vaccinated?

11 A. I'm not sure if -- well, I know they wanted  
12 everybody to be vaccinated. But, again, I was not  
13 vaccinated. I had not received the jab. I did not come  
14 back to work telecommuting -- on site. And like I said,  
15 I don't remember everybody coming back to work. I think  
16 there was some other kind of deadline or something like  
17 that. Might have been initially September, but I think  
18 it went -- then I think they pushed it to November.

19 Q. Okay. Thank you for that. I appreciate the  
20 clarification. And I know it's hard during the COVID  
21 years to pinpoint specific times --

22 A. Yeah. So much happened, so it was -- yeah.

23 Q. Yeah. All right. You identify as Christian,  
24 correct?

25 A. Yes.

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1 Paragraph 8.

2 (Whereupon Exhibit 2 was placed on the  
3 screen.)

4 BY MS. WOOD:

5 Q. So it says here, "The current COVID-19  
6 vaccines were derived from aborted fetal stem cells."  
7 And you state, "I will not take a vaccine derived from  
8 murdered children, because I'm a Christian. I believe  
9 in the sanctity of life."

10 Could you explain to me what your  
11 understanding of what it means -- that the COVID-19  
12 vaccines were derived from aborted fetal stem cells,  
13 what does that mean?

14 A. They used murdered children's stem cells to  
15 create a vaccine.

16 Q. And is that true for all three, Pfizer,  
17 Moderna and Johnson & Johnson?

18 A. Yes.

19 Q. And do you have an understanding as to whether  
20 the production process was the same for all three  
21 vaccines or if it differs?

22 A. I don't know how it differed. All I know is  
23 that they all use the same aborted fetal stem cells in  
24 order to supposedly create it. I'm not a scientist. I  
25 don't know that. I just know that that was utilized.



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1 Q. Do you have an understanding or belief as to  
2 whether the Pfizer vaccine actually contained, like,  
3 physical matter from aborted fetal stem cells in the  
4 vaccine itself?

5 A. My understanding is -- my understanding is  
6 that it was created -- now, whether it still has the  
7 aborted fetal cells in it, as far as I know -- some  
8 people have -- some scientists say yes, some say no.  
9 I'm not sure, but I would not take any vaccine that had  
10 any murdered fetal cells in it.

11 Q. Okay. I just want to clarify that, because I  
12 think -- I'm a little confused, because you said you  
13 wouldn't -- so do you believe that it -- that the Pfizer  
14 vaccine does have aborted fetal stem cells in it?

15 A. Yes.

16 Q. And what about Moderna? Do you believe that  
17 it has aborted fetal stem cells in the vaccine?

18 A. Yes.

19 Q. And for Johnson & Johnson, do you believe that  
20 it has aborted fetal stem cells in the vaccine?

21 A. Yes.

22 Q. If aborted fetal stem cells were not actually  
23 in the physical material of the vaccine, that it had  
24 only been used for testing, would that be okay with you?

25 A. No.

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1           A.     Right. Yeah. I used a lot -- I used  
2     basically a lot of the verbiage from the letter, yeah.

3           Q.     Okay. When you filled out your exemption  
4     form, you took some --

5           A.     Right, right.

6           Q.     So I want to understand, if you could tell me,  
7     how it is that you came to obtain this letter.

8                     Did you reach out to someone at Grace Bible  
9     Church to get it? Could you just walk me through how  
10    that happened.

11          A.     Yeah. I reached out to Pastor Jesse. He had  
12    been providing, you know, information, along with  
13    information I was obtaining from alternative news  
14    sources, about what was going on during the pandemic.  
15    And so -- you know, he wanted people to have this  
16    information -- that it was actually expert  
17    communications from doctors and scientists that he would  
18    provide their videos, podcasts, interviews, things of  
19    that nature for us to understand and get our own --  
20    getting our own view about what we need to do for  
21    ourselves, period. Something that the mainstream media  
22    was never doing.

23                     And like I've already mentioned in my previous  
24    testimony, it was always one-sided and there's always  
25    two sides, so he was helping provide the opposite or the

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1 other side of the spectrum about -- about the COVID  
2 plandemic -- excuse me -- pandemic.

3 And so along -- between him and other  
4 resources, like I said, alternative news, we were coming  
5 to our own conclusions about what was really going on  
6 and what needed to happen and how to protect ourselves  
7 and, you know, stuff -- you know, you can talk to your  
8 family about -- you know, about how to move forward,  
9 so -- yeah. All of this information was very vital and  
10 valuable during that period of time.

11 Q. I think I heard you use a term plandemic  
12 instead of pandemic.

13 What do you mean by plandemic?

14 A. That's my own opinion that it was planned.  
15 Okay. This whole thing was man-made, planned. Once we  
16 found out that it came out of a lab and it was bio  
17 weaponry, it was planned. It's not nothing that came  
18 from nature.

19 So anything that man does is planned. It's  
20 not coming from God or Mother Nature. It's coming from  
21 a person, creating something to harm somebody or  
22 something else, so that's why I called it planned.

23 Q. And who do you believe planned this?

24 A. Well, you know -- hey, now you've got to leave  
25 it to Fauci, NIH. I mean, you never know. They were

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1 taking tax dollars -- our tax dollars and funding it for  
2 gain-of-function research, so -- and, you know, you got  
3 Rand Paul, the Senator over there, he's talking about it  
4 in Congress all the time.

5 You know, all of this -- like I said, it  
6 wasn't nothing that came naturally from nature. So  
7 whether it started in America or then got switched over  
8 to Wuhan and then they finished that over there, that's  
9 created by man. That's why I said plandemic, because  
10 bio weaponry is a man-made product. That's not anything  
11 that's a natural product.

12 Q. Okay. So in terms of the part that was  
13 planned, is just -- does your understanding of that just  
14 extend to the actual COVID-19 virus or are there  
15 additional elements to this plan?

16 A. I'm -- I'm -- I'm -- I'm -- my opinion -- my  
17 opinion is that it was created for this virus, the  
18 virus -- as you know, like I said, you've got Robert  
19 Malone, who created the initial one. Remember that. So  
20 you go from that to what it is now. Robert Malone  
21 stated -- he said, had he known that they were going to  
22 use it for this, he would have never created it. There  
23 you go.

24 Q. When you say "created," what are you referring  
25 to?

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1           A.     The original SARS 1. This is SARS 2. SARS 1.  
2     He's the one that's responsible for creating the SARS 1.  
3     So what he created it for wasn't for this extent. So  
4     now they've created SARS 2, the -- Fauci, like I said,  
5     his organization, NIH, which he's retired from now, is  
6     responsible for using tax dollars to help fund  
7     gain-of-function research that caused this whole new  
8     virus, so that's my opinion.

9           Q.     Okay. Thank you for clarifying that.

10           Now, you had noted that Pastor Jesse Gistand  
11     had been providing a lot of information and podcasting  
12     videos.

13           Was the information that he put out something  
14     that you regularly viewed or listened to?

15           A.     Yeah. From time to time, like I said, I  
16     listened -- I got his information and I got the  
17     alternative news information that -- information that  
18     kind of coincided with what he -- what he provided.

19           And some of his information, I had already  
20     got. So he was showing -- just kind of like replaying  
21     some of the videos that I had already seen from some of  
22     the scientists and doctors who was trying to give  
23     alternative answers and information that legacy media  
24     wasn't putting out on regular TV.

25           Q.     And so was, generally, the type of information

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1 that Pastor Jesse was sharing, was it scientific or  
2 medical information related to COVID-19 and the vaccine?

3 A. Correct.

4 Q. Was he sharing information from politicians as  
5 well?

6 A. There was occasionally a politician, I think,  
7 but, generally, it was scientists and -- and doctors.

8 Q. Okay. Going back to the letter, here. So you  
9 said that you reached out to Pastor Jesse.

10 Do you recall whether that was a phone call,  
11 an e-mail or how you reached out to him?

12 A. E-mail, possibly. But, generally, when I  
13 attended the -- because he had in-person -- when he had  
14 the informational sessions, that's, generally, when I  
15 reached out was in person.

16 Q. Okay. If you had e-mailed him, would you  
17 still have that e-mail? Would you have kept that?

18 A. I don't know. I can't recall right now.

19 Q. Okay. That's fine. And so when you asked him  
20 about the letter, did you already -- was he offering to  
21 give out letters of this nature?

22 A. I didn't know that he was giving out -- I  
23 didn't know. I just know that I was going to ask him  
24 since he was being very supportive. And so I asked.  
25 And so I said, Can you, you know, provide a letter for

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1 its origin in abortion."

2 Do you see that?

3 **A. Yes.**

4 Q. So there are numerous other vaccines and  
5 medications that use fetal stem cells from aborted  
6 fetuses in the research and development of them.

7 Do you do anything to ensure that none of the  
8 other medications you take use aborted fetal stem cells?

9 MR. DAVIS: Objection. Facts not in evidence.

10 BY MS. WOOD:

11 Q. You can go ahead and answer.

12 **A. I'm not aware of which medications have --**  
13 **have or don't have stem cells them in.**

14 Q. So my question is a little bit different.

15 I wanted to know if before you take a  
16 medication, do you do research into whether or not fetal  
17 stem cells are used in the production of that particular  
18 medication?

19 **A. So before I take a medication that is**  
20 **prescribed to me, I ask my doctor about the safety and**  
21 **the effectiveness of the medication. I'm very leery**  
22 **now -- and actually prior to COVID, because certain**  
23 **medications have been -- for me, I've had, like, certain**  
24 **bad reactions. So that's a question that I have with my**  
25 **health care provider. So my health care provider has**

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1 been very up front and trustworthy, to this point, to a  
2 certain degree. And so I trust my health care provider  
3 not to give me something that's going to kill me or that  
4 I'm going to disagree with it.

5 So if it happens to be something that I  
6 disagree with, then I'll always ask her for an  
7 alternative medicine. That's what I usually do.

8 Q. I just want to make sure that I'm getting an  
9 answer to the question that I asked, since your answer  
10 focused a lot on safety and effectiveness.

11 Have you told your medical provider that you  
12 object to using any medications that used fetal cell  
13 lines in their development?

14 A. I have spoken to my doctor about fetal cells,  
15 but -- but I did not tell her that I object to taking  
16 them, but her response -- I'm sorry. I have to say  
17 this.

18 Her response is -- is that I wouldn't  
19 purposely give you anything that I know for sure has  
20 anything in it. So at that point, I never asked her  
21 again about whether or not this medicine had fetal cells  
22 in it when she prescribed it to me.

23 Q. Okay. Do you recall when this conversation  
24 took place with your medical provider?

25 A. That didn't happen until after COVID,



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1 seriously. Because, you know, you didn't believe that  
2 this was going to be a problem, but -- yeah. That  
3 happened probably in -- could have been in 2020 going  
4 into 2021. I cannot exactly remember the date.

5 Q. Okay. And so I just want make sure I have  
6 this right.

7 So you said your doctor told you that she  
8 wouldn't prescribe you anything that had fetal cells in  
9 it; is that correct?

10 A. Wait a minute. Hold on. Not knowingly.

11 Q. Not knowingly?

12 A. Yeah.

13 Q. What about -- did you -- did you discuss with  
14 her whether or not -- so setting aside whether there's  
15 actually fetal cells in the medication, which I  
16 understand would be incredibly rare, did you discuss  
17 with her about fetal cells being use for production or  
18 development, as opposed to being physically in the  
19 medication?

20 A. No. I did not talk to her about that.

21 Q. What about testing? Did you ask her whether  
22 the medications used fetal cells for -- to test the  
23 efficiency of them?

24 A. No. I did not have that conversation with  
25 her.

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1                   And I said, Really? That -- that's all  
2                   I could say. You know, basically, I said, where is --  
3                   you know, they never gave me any data. They just  
4                   basically said it and I was supposed to believe them,  
5                   but -- the City says a lot of stuff and it doesn't mean  
6                   that it's true, so, you know, I didn't know whether or  
7                   not to believe the City or not.

8                   Q.    Did you do any of your own research after  
9                   receiving that list of medications from the City to see  
10                  whether or not what they were representing about the use  
11                  of the fetal cell lines is true?

12                  A.    The only one that I was able to get a  
13                  confirmation on was ibuprofen. That's the one that I  
14                  was able to get it, because it's not like -- they've  
15                  changed the way searches are. To me, you can't always  
16                  dig deep into a search and get exactly what -- because  
17                  I've -- what I'll say is this, This medicine have a --  
18                  derived from aborted fetal cells. And it gives you all  
19                  this other stuff and doesn't give you exactly what you  
20                  need and so it's kind of hard to get that information.

21                  Q.    Did you ask your medical provider if she had  
22                  that information?

23                  A.    No, I did not.

24                  Q.    Now, if we look at the bottom of this page,  
25                  there is some information from the VAERS report.

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1           A.    Uh-huh.

2           Q.    All right.   And in here it has some statistics  
3   as of July 3rd, 2021.   And for the BioNTech/Pfizer, it  
4   lists 9,868 deaths and 767,225 injuries.

5                   Do you see that?

6           A.    Uh-huh.

7           Q.    Were you opposed to -- and then there's  
8   similar statistics for Moderna.   Looks like a smaller  
9   number of deaths, but still over 5,00 and then over  
10   212,000 vaccine injuries.

11                   Did you understand this information that's in  
12   this letter to be true?

13           A.    Well, these are -- yeah, I -- I -- I  
14   understand this information to be true.   It's supposed  
15   to be coming from the CDC, because the CDC and FDA have  
16   the VAERS report -- the reporting system that either  
17   patients who have gotten harmed or doctors who are  
18   supposed to report this information to.

19                   So I'm sure that this information is outdated  
20   and it's probably more injuries and deaths than what it  
21   is reported here on this particular letter.

22           Q.    You know, did these numbers of injuries or  
23   deaths strike you as being high compared to what you  
24   would expect for another type of vaccine, like tetanus  
25   or MMR?

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1           A.    Of course it did, because it's 30 times more  
2   than any -- if you go on the VAERS report, which I have,  
3   they actually show all the other injuries and deaths,  
4   over all -- of all the other vaccines that's come out.  
5   And the vaccines for COVID is way worse than the total  
6   of all the other ones combined, so -- yeah, this is --  
7   it's really bad.

8           Actually, there's supposed to be a safety  
9   protocol that they're supposed to recall medications if  
10  it goes over five deaths.   It's -- my understanding, if  
11  it goes over five deaths, they're supposed to recall the  
12  med.   They're not even supposed to keep it going.

13           And these people are so greedy, as far as  
14  money is concerned, making money off this thing, they  
15  don't care.   So they don't -- look, you got 9,000 --  
16  almost 10,000 deaths on Pfizer and you got 5,500 on  
17  Moderna.

18           Like I said, this information is outdated, but  
19  even five deaths should have stopped the vaccine --  
20  their so-called jab, from furthering usage, and it  
21  didn't and so that's a major problem.   All of this is a  
22  major problem, but nobody is doing anything about it.

23           Q.   And so this major problem, this high number of  
24  deaths, a reason why you refused to get the COVID-19  
25  vaccine?

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1           **A.**    Like I mentioned in the previous questionnaire  
2   you asked me about, it's a concern.   And also -- my  
3   primary is the fact that it had -- it's being used by  
4   fetal cells -- aborted fetal cells.   That's the primary.  
5   But this is also a major issue, because it is causing  
6   deaths and it is causing harm.

7                   And I already -- like I said before, my  
8   previous testimony, I already have problems with me,  
9   that I don't need help from a shot to kill myself, okay,  
10   or to die.   So -- so -- so being pressured to take  
11   something that I know ultimately is going to cause me  
12   harm is a problem.

13           Q.    Thank you.

14                   MS. WOOD: We can take this exhibit down.

15                   (Complied.)

16   BY MS. WOOD:

17           Q.    Now, we took a break a bit earlier, about an  
18   hour ago.

19                   During the break, did you speak to your  
20   attorney?

21           **A.**    No, I did not.

22                   MS. WOOD: Okay. So let's just go off the  
23   record for one moment here.

24                   (Off the record at 12:28 p.m. and back  
25   on the record at 12:40 p.m.)

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1 Q. And then -- all right. So we'll first look at  
2 the e-mail on this first page, here.

3 And in the third full paragraph, you mention  
4 the time frame. And it says, "My understanding  
5 attending the Citywide COVID meet and confer table is  
6 the exemption accommodation process should be a seven  
7 (7) day turnaround."

8 A. Right.

9 Q. Do you see that?

10 A. Yes.

11 Q. When you say the "Citywide COVID meet and  
12 confer table," could you tell me what it is that you  
13 mean by that?

14 A. Well, basically by being a shop steward and  
15 being on the bargaining team, we -- actually, the union  
16 and the City had met. And the City is the one that said  
17 there should be a seven-day turnaround, informing the  
18 union that -- during this time.

19 So that's where I'm getting that from.

20 Q. Okay. And you actually attended the meet and  
21 confer on behalf of SEIU --

22 A. Yes. Yes, because I was a bargaining team  
23 member, yes. From the previous contract, yes.

24 Q. Okay. Have you filed a grievance with SEIU  
25 related to the COVID-19 vaccination policy?

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1           A.    Yes.

2           Q.    Do you have an arbitration date set yet for  
3 your grievance?

4           A.    No.   It's been back and forth, so I have to  
5 get into contact with the union.   A lot of players have  
6 changed, too, so that's a major problem.

7           Q.    On.   And through that arbitration, is the  
8 relief you're seeking to get your job back?

9           A.    My job back, also address the violation of  
10 my -- there are several things going on.   There's  
11 getting the job -- well, not getting dismissed from my  
12 job, plus the ADA and medical violations that the City  
13 did towards me during this whole process is --

14                   Again, I was out on disability.   I should have  
15 not had to actually deal with this stuff, but I was  
16 constantly being bombarded by the City, with my  
17 employer, DHS and department of human services in a  
18 nonpolicy, illegal manner.   I -- you know, everybody  
19 else -- what I've heard is other individuals, across  
20 other City departments who had been on disability, have  
21 not had to address this until they came back.   I wasn't  
22 given that option at all.   I was constantly violated,  
23 bombarded every single week, every month.   I couldn't  
24 rest.   So that meant my chronic illness that I was  
25 dealing with, the stress and the anxiety and the -- the

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1 episodes of my atrial fib continued -- was ongoing. I  
2 couldn't get any rest. I -- I -- it was just  
3 ridiculous, so -- yeah. All of that is part of the  
4 issue.

5 Q. Is your religious exemption at issue in your  
6 grievance?

7 A. Yes, it is. It should be in there, yes.

8 Q. So I know you don't have an arbitration date  
9 set.

10 A. Right.

11 Q. Once you get one set and then the arbitrator  
12 issues the decision, if you would -- if you and the  
13 union would prevail, then you would expect to be  
14 reinstated to your prior position with backpay?

15 A. I'm -- I'm -- I'm assuming, yes. I'm  
16 assuming, yes. Because I have -- like I said, I  
17 haven't -- there hasn't been anything set up and I  
18 haven't talk to anyone for a minute, so -- again, I'm  
19 not sure what's going on. I'm going to have to give  
20 some calls. Again, like I said, the players have  
21 changed and -- so I'm trying to find out what -- what --  
22 what -- what -- what the last issue -- or what -- where  
23 we stand and what's the updates. I need to get that.

24 Q. Okay. So do you recall approximately when you  
25 filed your grievance?



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1           A.    Yeah. Yeah. There's several Bible apps  
2   that's out there. The one that I use, I basically use  
3   it to give daily prayers and pray every day, so it gives  
4   me a different message, a different inspiration and then  
5   a different prayer at the end. And a lot of times, I'll  
6   share those with my friends and family, you know.  
7   Because a lot of times, depending on what I'm feeling,  
8   it will give me something that's totally on point on  
9   what I'm currently dealing with, and so -- but -- but it  
10  gives me a notification on a daily basis and I read it.

11           Q.   Okay. Thank you for that.

12                   And when you were filling out these  
13  responses -- let me back up.

14                   Do these responses that you submitted to human  
15  resources, do they accurately reflect your beliefs at  
16  the time that you sent them in?

17           A.    Yes.

18           Q.    I want to look, first, at Question No. 1,  
19  which says to, "Please identify the specific religious  
20  tenet that prohibits the COVID-19 vaccination."

21                   And there you indicate a Bible verse relating  
22  to the body being a temple and God's temple being holy.  
23  And then you wrote, "My body is not to be subjected to  
24  coercive experiments with clear danger and harm already  
25  proven by the CDC/VAERS."

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1 Do you see that?

2 A. Yes.

3 Q. Could you very briefly -- let me strike that.

4 So based on this here, you were telling the  
5 human resources department that you believe that using  
6 the COVID-19 vaccine would be harming your body, which  
7 you feel is God's temple; is that accurate?

8 A. That's accurate.

9 Q. And there's the clear danger and harm.  
10 Is that in line with what we've already  
11 discussed about the vaccine injuries and deaths?

12 A. Yes. That's a clear danger, yes.

13 Q. And you call it "coercive experiments."  
14 What do you mean by that?

15 A. What the City was doing to us -- trying to  
16 coerce us to take the vaccine in order to keep our job.

17 Q. And what about the use of the term of  
18 "experiment."

19 What did you mean by that?

20 A. Well, because it's not -- it wasn't actually  
21 legally made a vaccine. So basically an experiment,  
22 you're supposed to have Constitutional bodily autonomy  
23 in order to make a decision about whether it was right  
24 or bad for you. So you're supposed to be, ultimately,  
25 the person that says, Okay, I'm doing that, or, Okay,

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1 I'm not going to do that. You're not supposed to have  
2 to go through coercion for an experiment that's not  
3 legally made a vaccine. They bait and switch. This is  
4 gene therapy.

5 So at the end of the day, it was never a  
6 vaccine. Because remember, the only thing that was  
7 licensed was the COMIRNATY. COMIRNATY was never  
8 available in the United States. So at -- everything  
9 else, even though it's emergency use, it's still an  
10 experiment, because they never had any data behind it,  
11 stating whether it would cause harm or not. Remember, I  
12 just mentioned before, that in the commercials they  
13 never had the side effects, the normal disclosures,  
14 letting people know that this can do X, Y, Z to your  
15 body, period. Never did it. You still don't see it on  
16 COVID commercials.

17 So they're -- they're -- they're promoting  
18 something that causes harm -- that clearly causes harm,  
19 but -- and then they're not being transparent about it  
20 and they're not being held accountable and there's no  
21 integrity. So why would you put something like that in  
22 your body?

23 Q. Okay. Thank you for that.

24 Let's go down to No. 3. It says, "Can you  
25 provide any existing literature to support your

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1 have to prove my religion to you, how -- what my beliefs  
2 are? No one should have to do that, because no one --

3 Matter of fact, I asked in -- that's the  
4 reason why I asked if you had those questions -- which I  
5 probably should have also put in as a notification,  
6 which I thought did, an e-mail to them about their  
7 actual -- what gives them the -- what qualifies them to  
8 make a determination about religious -- none of them in  
9 the HR or LR office have religious background. So how  
10 would you know how to make a determination about whether  
11 to grant somebody a religious accommodation. No one has  
12 it. Everybody is getting taught. This is on the fly.  
13 No one had -- knew how to deal with this. No one.

14 Q. You also mentioned a violation of your bodily  
15 autonomy.

16 So you also believe that the vaccine policy  
17 was violating your personal autonomy, right?

18 A. Yes, I did. Because, first of all, it's my  
19 body. I'm supposed to make that decision. Not you, not  
20 nobody from the City. No one should be coercing me. No  
21 one should try to tell -- the man -- your supposed to  
22 take this just to keep your job.

23 Let me just say. It was never a requirement  
24 for me to be hired with the City and County of  
25 San Francisco when I got hired. This was never an

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1 issue. Now, all of a sudden, it's a issue. Every  
2 single person who is trying to get with the City now,  
3 they want to ask them these questions. Why? That's  
4 not -- that's not even legal. Why they even asking that  
5 to get hired for an employment -- for a career. They  
6 shouldn't be doing that.

7 Q. In your view, do you believe that the City  
8 should have granted any and all requests for religious  
9 exemption that were made by its employees?

10 A. Yes, I do.

11 Q. So going back to the exemption process. You  
12 had said that you believe that all the requests should  
13 be granted.

14 So do you believe it was impermissible for the  
15 City to ask any follow-up questions when they  
16 received the religious exemption request?

17 A. Where did the exemption questions come from?  
18 Who designed these questions? How -- like I said, what  
19 qualifies the individual asking these questions to even  
20 receive the answers? If the answers -- even if the  
21 answers are correct, how can you make a determination if  
22 you're not qualified to make a determining.

23 To me, it was a blanket no for mostly  
24 everybody who asked to get a request -- to get the  
25 religious accommodation request. And then for an

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1     **that.**

2           Q.     I'm not asking -- I'm not trying to imply any  
3     of that --

4           A.     **All right.**

5           Q.     Did you share this response with Ms. Fountila?

6           A.     **I don't remember. I don't remember.**

7           Q.     And why did you believe that this question was  
8     irrelevant to the matter?

9           A.     **Because if -- I mean, the thing is, what does**  
10    **that have to do -- if you're worshipping, you're**  
11    **worshipping. Whether somebody has a belief about COVID**  
12    **or don't have a belief about COVID, it shouldn't matter.**  
13    **We are all worshipping the same -- same God. So to me,**  
14    **that didn't make any sense.**

15          Q.     **Okay. I want to go down to Question No. 7.**  
16    **And this one asks, "Please identify the specific**  
17    **religious tenet, practice or observation used to**  
18    **identify substances that are harmful and state how you**  
19    **applied this to the COVID-19 vaccine."**

20                **And first you note that you're an evangelical**  
21    **Christian who believes in the Bible as the Word of God**  
22    **and that loving God and neighbor means do no harm.**

23                **And then you wrote here, "My religious**  
24    **objections to CV-19 mRNA and adenovirus vector vaccines,**  
25    **the COVID-19 vaccines, is because they do not operate**

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1 the same as traditional vaccines. Instead of fragment  
2 dead virus and an adjuvant to induce immune response,  
3 they use genetic coding to instruct the body to produce  
4 a spike protein that is not natural to your own human  
5 genetic system."

6 Where did you get this information from for  
7 this response, here?

8 A. I know I got it from -- no. I don't know,  
9 exactly. Let me just rephrase that. Strike that.

10 Let me just say that I can't remember exactly  
11 where I got that from, but it was -- it was appropriate  
12 and that's why I used it. It could have been some -- a  
13 resource that I read or something like that. I can --  
14 can't, off the top, remember exactly where I got that  
15 from.

16 Q. So one of the objections that you had to the  
17 vaccine was that you believe that the spike protein in  
18 it would alter your DNA or your genetic material --

19 A. Yes. That was some of the information I got  
20 from alternative sources as well.

21 Q. And would those be, like, news sources, like,  
22 scientists, doctors that you mentioned before?

23 A. Right, right.

24 Q. I want to go to the next page to Question  
25 No. 10. So Question No. 10 asks, Have you ever taken

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1           **A.     I have one.**

2           Q.     How old is your child?

3           **A.     She is now -- she's 38.**

4           Q.     Did you have her vaccinated as a child?

5           **A.     That was a requirement at the time. I don't**  
6 **know if I did all of her vaccinations. But that was a**  
7 **recommendation from the pediatric doctor. And at that**  
8 **time, I trusted the pediatric doctor. I was a young**  
9 **mother. I was in my early twenties, so I had not done a**  
10 **whole lot of research on vaccinations, then. No one was**  
11 **doing that. People were just following doctor**  
12 **recommendations.**

13          Q.     I want to scroll down to Question No. 13.

14                 So we've -- you've alluded to this question  
15 earlier in your testimony.

16          **A.     Right.**

17          **Q.     This was -- you had mentioned that there was a**  
18 **question that indicated that many common medications**  
19 **were developed using the same type of fetal cell line**  
20 **technology as the COVID-19 vaccine.**

21                 **Is this what you were thinking of when you**  
22 **were testifying about that list?**

23          **A.     Yes.**

24          **Q.     And then in your response, you wrote, "I do**  
25 **not utilize many of the medicines mentioned, but I have**

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1 always had the choice of whether or not to take them.

2 They have never been forced on me or affected my

3 livelihood."

4 A. Uh-huh.

5 Q. First I want to ask you, which of these

6 medications have you taken in the past, and we can just

7 go through in order.

8 The first one is Tylenol.

9 Is that something you've taken in the past?

10 A. Yes. I have taken that in the past.

11 Q. When do you recall -- do you still take

12 Tylenol?

13 A. No, not really. Actually, I don't really have  
14 headaches and stuff like that like I used to back in the  
15 day, but -- yeah.

16 I actually -- I bought it for a family member  
17 or whatnot for a fever, because that's generally what  
18 it's used for. Never for pain, so --

19 But like I said, on the list, that you guys  
20 have here, no one knew about that. I mean, no one was  
21 thinking about -- about the fetal cell line for vaccines  
22 or any other medications prior to this. No one even  
23 really realized that that was being done with meds --  
24 with drugs, in general, so -- and then there was no --

25 There's a statement being made in this

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1 question, but there was no data or backup or any kind of  
2 cliff note, footnote, whatever to explain, Okay, this is  
3 where you can get it from to prove that this -- these  
4 are meds that we're talking about. It was just thrown  
5 out to us, as far as a question.

6 Q. So you mentioned that you purchased Tylenol  
7 for a family member who had a fever.

8 When did you purchase Tylenol the last time?

9 A. Shoot. That's probably, like, almost a year  
10 ago, six months. I'm saying it because it's in this  
11 period of time.

12 Q. Okay. So you purchased that.

13 And since the fall of 2021, have you  
14 personally taken Tylenol?

15 A. No.

16 Q. But you did buy Tylenol for a family member?

17 A. I did.

18 Q. And when purchasing it, did you have any  
19 concerns that you might be purchasing a product that had  
20 used fetal cell lines in its development?

21 A. You know what -- let me just also say. I  
22 forgot about everything in this list that was mentioned.  
23 Because, again, that wasn't something that was  
24 disclosed, like -- you know, if it's a commercial that's  
25 out, like Tylenol, it didn't say, Oh, it's made from --

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1 or derived from fetal cells. They don't say that, so I  
2 just -- I definitely wasn't thinking about that.

3 Q. But if Tylenol is, in fact, developed using  
4 fetal cell lines, would it violate your religious  
5 beliefs for you to purchase that Tylenol?

6 A. Yes, it would.

7 MR. DAVIS: Calls for speculation.

8 BY MS. WOOD:

9 Q. Okay. Have you taken Pepto Bismol?

10 A. No.

11 Q. Aspirin?

12 A. Baby aspirin, years ago.

13 Q. Have you taken it at any time in the last two  
14 years?

15 A. No.

16 Q. What about Tums? Is that something you've  
17 taken before?

18 A. I have taken Tums before.

19 Q. When is the last time you took Tums?

20 A. I took -- I'm just going to be honest. I took  
21 Tums maybe three months ago.

22 Q. And did you have any concerns about --

23 A. I did. I did. And at the time I took it for  
24 it, it didn't help me anyway, so...

25 Q. So you had concerns. What were those

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1 concerns?

2 A. It was just -- it's just the general concern  
3 of taking something that I know I didn't have no  
4 business taking, because I don't believe in with -- how  
5 it was derived and -- but I was suffering, you know. My  
6 body was in crisis and I needed to make sure I tried to  
7 take something.

8 Because other than that, I just tried to --  
9 generally, what I do -- because I have acid reflux and  
10 so -- and, generally, what I will do is take -- drink  
11 ginger ale to try to settle it and so -- yeah. But that  
12 was -- like I said, that was about three months ago.

13 Q. So help me understand this. Why is it that  
14 you cannot take the COVID-19 vaccine because of its  
15 relationship to the use of fetal cell lines, but it was  
16 okay for you to take Tums three months ago?

17 MR. DAVIS: Assumes facts not in evidence.

18 BY MS. WOOD:

19 Q. You can go ahead and answer.

20 A. So this was because I -- at that time, I was  
21 having discomfort and no -- after I took it, I thought  
22 about it, but I had already taken it, so it was too late  
23 by then, so...

24 Q. If the COVID-19 vaccines -- I understand that  
25 you don't believe that they are vaccines, but if they

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1           **A.     No.**

2           Q.     Claritin?

3           **A.     No.**

4           Q.     Zoloft?

5           **A.     No.**

6           Q.     Prilosec OTC?

7           **A.     No.**

8           Q.     Azithromycin?

9           **A.     No.**

10          Q.     I believe that's an antibiotic.

11          **A.     Right.**

12          **Q.     And in your response, you said, "I see a clear**  
13 **difference between helping a body in crisis and**  
14 **addressing a healthy body with medical help or**  
15 **intervention. If my body were in crisis, I would**  
16 **consider all the options and discuss what to do with my**  
17 **trusted physician/healer while praying for God's help,**  
18 **guidance and healing for longevity to my life."**

19               **Can you explain to me what you mean by that**  
20 **response there?**

21          **A.     Well, let me just say that pharmaceutical**  
22 **medicine is not the only way to help heal you. And**  
23 **there are -- I've always asked my physician about more**  
24 **natural ways to help with any of my ailments. She knows**  
25 **that I do not like taking meds, period, but I'm only**

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1 taking them right now, for the time being, until I can  
2 find alternative methods. So -- but she has referred me  
3 to different places, in order for me to take meds -- I  
4 mean, not take meds and to do a more natural course,  
5 so -- and she knows I don't like taking medicine. She  
6 knows that. And so I've been going back and forth with  
7 her for about, you know -- anywhere from 10, 12 years or  
8 so to do something different.

9 Q. What I was kind of more wanting to understand  
10 is, do you see there's a difference in terms of -- if  
11 medication was developed using fetal cell lines, do you  
12 think there's a difference if that medication is being  
13 offered in a situation where it's going to potentially  
14 save the person's life or there in acute distress,  
15 versus the COVID-19 vaccination, which is something  
16 that's given prophylactically; it's to prevent illness.

17 Do you see a difference in those two?

18 MR. DAVIS: Objection. Calls for speculation.

19 THE WITNESS: I do see a difference. The  
20 difference to me is where it's derived from.

21 You know, the bottom line is this so-called  
22 vaccine didn't prevent anything. People still caught  
23 COVID-19, started spreading COVID, transmitted COVID.  
24 So it -- like I said, I have documentation, many, many  
25 e-mails of November 1st -- the first week of November

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1 when people stepped down that were not vaccinated.

2 The problem with the City and County, compared  
3 to the State, they gave the option of testing. I could  
4 have simply been tested. The City -- the mayor, she  
5 decided to be a bully. Everybody needs to be  
6 vaccinated. No, everybody doesn't need to be  
7 vaccinated, because the vaccination doesn't work. The  
8 COVID shot does not work.

9 It's -- if -- initially, they said that it  
10 would prevent you from getting COVID. That's what they  
11 said out the gate. Then they twisted it up, you know,  
12 bait and switched it and said, No, it's not going to  
13 prevent -- it will stop you from being in the hospital  
14 or stop you from dying, but that was a lie. So the  
15 whole thing has been a lie. So at the end of the day,  
16 would -- what's the agenda? Who's benefiting from this?  
17 No one.

18 BY MS. WOOD:

19 Q. Okay. So as I'm understanding you, it sounds  
20 like one of the big issues that might differentiate the  
21 COVID-19 vaccination that used fetal cell lines in  
22 production and other medications that are effective, but  
23 that also were developed using fetal cells lines, is  
24 that, on the one end, certain medications are effective.  
25 On the other hand, in your view, the COVID-19

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1 vaccination is completely ineffective.

2 Is that the key difference?

3 A. No, no, no, I'm not saying that. At the end  
4 of the day, really none of them are effective to really  
5 treat anything -- or let's say -- what I'm saying is to  
6 cure what's wrong with somebody. So, basically, this is  
7 supposed to help somebody along, who is suffering. But  
8 when -- the difference between the two is one is a  
9 choice. The other was not. And if you have a choice  
10 and you know that -- okay, this is something that you  
11 don't agree with, then you have a choice not to take it.

12 Yeah, I slipped and I took some Tums, three  
13 months ago. I took a Tum. Let me correct that. I took  
14 a Tum, okay? I should not be held at -- for a mistake  
15 that really didn't help me for this purpose.

16 The purpose I'm saying is that it was a choice  
17 that I decided to do that. When this particular  
18 situation was put upon me, it was never a choice. It  
19 was pushed me on. It was forced on me. I was coerced.

20 But it -- at the end of the day, the COVID,  
21 so-called vaccines, never helped anybody. Even though  
22 they claimed, Oh, it will keep you out of the hospital,  
23 it will keep you from having really major issues. That  
24 whole situation was a lie, so -- you know, you're  
25 talking about something that's -- that has clear data,

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1 that has clear -- that's a clear falsehood that you're  
2 trying to push on people, in comparison to something  
3 that's been out for years. And, unfortunately, didn't  
4 disclose that it also may have had fetal cell -- and how  
5 it was created. I don't know that for sure. You're  
6 saying that.

7 I still don't know that these meds that you  
8 have on the side -- that the City has on the side of  
9 this questionnaire actually derived -- there's no data  
10 even proving that. So I'm just taking it from your  
11 mouth to my -- or to my ears. I don't know for sure if  
12 that's even the truth, so --

13 You know, to try to put me -- guilt trip me,  
14 that's not going to help me. What I need is to get my  
15 profession back, my passion back, my career back, in  
16 order for me to make sure that other people are okay and  
17 to support others in the community. That's what I want  
18 back.

19 Q. I believe you just called taking Tums, three  
20 months ago, a mistake.

21 Why do you believe it was a mistake to take  
22 Tums?

23 A. Because, at the time, I wasn't thinking. I  
24 think I was just thinking about my -- my -- you know, my  
25 discomfort at the time. But like I said, it didn't even

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1 help me. And so me drinking some ginger ale actually  
2 did. And so -- you know, unfortunately, there it is.  
3 But like I said, I'm not -- you know, all I can do is  
4 forgive myself.

5 In reality, I wouldn't just be popping drugs  
6 that -- if I'd known, I, generally, wouldn't be popping  
7 drugs that I know derive from fetal cells. Because, you  
8 know, to create murder in order achieve a goal, is --  
9 is -- is really a problem and it is a sin.

10 You know, at the end of the day, they have to  
11 find other methods in order to create the things that  
12 they're trying to create to supposedly help people,  
13 so...

14 Q. Okay. Thank you for that response. I'm not  
15 sure if I got -- if you answered quite precisely the  
16 question that I asked. Maybe I'll ask a more narrow  
17 question.

18 Did you believe it was a mistake to take Tums  
19 because you understood that it may have used fetal cell  
20 lines in its development?

21 A. Yes.

22 Q. Thank you for that.

23 MS. WOOD: We can take down this exhibit.

24 (Complied.)

25 ///

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## 1 CERTIFICATE OF DEPOSITION OFFICER

2  
3 I, ANGIE M. MATERAZZI, CSR No. 13116, duly  
4 authorized to administer oaths Pursuant to Section  
5 2093(b) of the California Code of Civil Procedure,  
6 hereby certify that the witness in the foregoing  
7 deposition was by me duly sworn to testify to the truth,  
8 the whole truth and nothing but the truth in the  
9 within-entitled cause; that said deposition was taken at  
10 the time and place therein stated; that the testimony of  
11 the said witness was reported by me remotely and  
12 thereafter transcribed by me or under my direction into  
13 typewriting; that the foregoing is a full, complete and  
14 true record of said testimony; and that the witness was  
15 given an opportunity to read and correct said deposition  
16 and to subscribe the same.

17 I further certify that I am not of counsel nor  
18 attorney for either or any of the parties in the  
19 deposition and caption named, or in any way interested  
20 in the outcome of the cause named in said caption.

21 I hereby certify this copy is a true and  
22 exact copy of the original.

23 Date: July 31, 2023

24   
25 \_\_\_\_\_  
ANGIE M. MATERAZZI, CSR 13116

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